



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829  
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

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217/524-3300

DEC 02 2010

US EPA RECORDS CENTER REGION 5



1000084

Detrex Corporation  
Attn: Mr. David Craig  
P.O. Box 5111  
Southfield, MI 48086-5111

Re: 0311860003 -- Cook County  
Detrex Corporation  
ILD 074424938  
Log No. B-113R-M-3  
RCRA Permit File  
Permit Approval

Dear Mr. Craig:

This letter is in response to your submittal dated August 3, 2010, September 16, 2010 and December 1, 2010, requesting a Class 2 modification. The Agency has approved your Class 2 modification request to install a second loading dock.

The Agency has reviewed the information contained in your submittal and has determined that Detrex may implement this modification. This determination is based upon our review of (1) the RCRA Part B Permit issued to Detrex, (2) the regulations [35 Ill. Adm. Code Subtitle G] and (3) the information contained in your submittal. Operations must be conducted in accordance with the approved Part B Permit originally issued to Detrex and all subsequent modifications to the Part B Permit. Only the Illinois E.P.A. portion of the permit has been modified. Changes to the permit are described in Attachment 1 to this letter.

Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This permit does not relieve anyone from compliance with the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Rockford • 4302 N. Main St., Rockford, IL 61103 • (815) 987-7760

Elgin • 595 S. State, Elgin, IL 60123 • (847) 608-3131

Bureau of Land – Peoria • 7620 N. University St., Peoria, IL 61614 • (309) 693-5462

Collinsville • 2009 Mall Street, Collinsville, IL 62234 • (618) 346-5120

Des Plaines • 9511 W. Harrison St., Des Plaines, IL 60016 • (847) 294-4000

Peoria • 5415 N. University St., Peoria, IL 61614 • (309) 693-5463

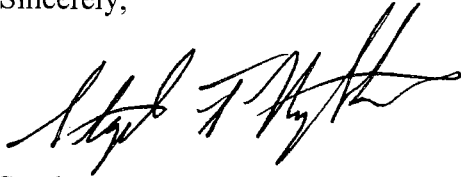
Champaign • 2125 S. First St., Champaign, IL 61820 • (217) 278-5800

Marion • 2309 W. Main St., Suite 116, Marion, IL 62959 • (618) 993-7200

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If you have any additional questions in this matter, please contact Mary Riegle at 217/524-3329.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen F. Nightingale". The signature is fluid and cursive, with the first name "Stephen" being more prominent.

Stephen F. Nightingale, P.E.  
Manager, Permit Section  
Bureau of Land

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Attachment 1: Changes to permit

cc: Willie Harris, USEPA

Attachment 1  
Changes to Permit

The following changes were made to the permit:

1. New loading dock approved in Condition VI.8.

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PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

### HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

Detrex Corporation  
Attn: Mr. Robert Currie  
P.O. Box 5111  
Southfield, MI 48086-5111

Illinois EPA #0311860003 -- Cook County  
USEPA ILD074424938  
Detrex Corporation, Melrose Park Facility  
RCRA Permit No. 113R-M-3  
RCRA -- Part B Permit File

Issue Date: October 9, 2003  
Effective Date: November 13, 2003  
Expiration Date: October 9, 2013  
Modification Date: DEC 02 2010

A RCRA Part B renewal Permit is hereby proposed pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (I.A.C.) Parts 702, 703, 705, and 720 through 729 to the Detrex Corporation Melrose Park facility to operate a waste management facility involved in the storage of hazardous waste. Detrex Corporation is located at 2537 LeMoyne Avenue, Melrose Park, Illinois.

This permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and Title 35 I.A.C. Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 2, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which is issued. This Permit contains 90 pages including Attachments A through F.

If you have any questions regarding this Part B Permit, please contact Mary Riegle at 217/524-3329.

Stephen F. Nightingale, P.E.  
Manager, Permit Section  
Bureau of Land

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HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

DETREX CORPORATION

Melrose Park, Illinois

LPC No. 0311860003 -- Cook County

ILD074424938

Permit Log No. 113R

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## SECTION I GENERAL PROVISIONS

### I. General Description

Detrex is located in Melrose Park, Illinois. The facility is designed to store and transfer hazardous and non-hazardous spent solvent wastes. These wastes may be either solids, liquids or sludges, and received in containers. The waste are halogenated organic hazardous wastes under 35 Ill. Adm. Code 721, classified as F001 or F002 and the corresponding U codes for these materials. The wastes may also be dully classified as D-series wastes with respect to Toxicity Characteristic Leaching Procedure parameters. This is a draft renewal RCRA Part B Permit for an existing facility. Detrex also accepts and transfers non-hazardous waste under Permit No. 1980-044-OP. Products are also stored on-site.

Spent solvent wastes are collected from industries such as: the metal working industries that clean oil and grease from machined and stamped parts, rubber molding operations where defective parts are removed from metal inserts, the electronic industry where circuit boards and other components are cleaned and defluxed, industries that spray paint on an assembly line basis where hangers and conveyor components are cleaned with solvents on-line, and other similar type industries.

The hazardous waste operation at the facility in Melrose Park, Illinois consists of a container storage area used for the storage of DOT containerized solvent wastes prior to the transfer of these wastes to an off-site Detrex solvent reclamation (recycling) facility, or to an off-site permitted treatment/disposal facility.

### II. Specific Hazardous Waste Management Units

The facility has one hazardous waste container storage area. The maximum volume of hazardous waste to be stored in this area shall be 13,200 gallons, corresponding to a maximum of 240 55-gallons drums.

### III. Approved Application

The facility received its initial permit on September 30, 1992. This Permit expired on November 4, 2002. An application for renewal was received on May 1, 2002. This permit is based on the application for renewal.



## SECTION II CONTAINERS

### A. SUMMARY

Containers of hazardous waste shall be stored in the hazardous waste storage area. The hazardous waste storage area is located indoors, in the northern half of the site. The portion of the building that makes up the hazardous waste storage area is defined by its diked concrete base. The concrete is coated with a chemical resistant sealant. The hazardous waste storage area shall have a containment capacity of at least 11,269 gallons. This containment capacity is adequate to contain at least 10 percent of the volume of the hazardous waste, non-hazardous waste and product containers to be stored within the secondary containment system. The maximum volume of hazardous waste to be stored in the hazardous waste storage area shall be 13,200 gallons, corresponding to a maximum of 240 55-gallon drums. A maximum of 579 55-gallon empty containers, containers of product and/or non-hazardous waste (stacked 3 high) may also be stored within the secondary containment area. The only waste which may be stored in the hazardous waste storage area are hazardous wastes as identified in Table C-1 of the approved permit application.

### B. WASTE IDENTIFICATION

1. The storage of all hazardous waste containers shall only be conducted in the approved storage area shown as the hazardous waste container storage area on Attachment D-1 of the approved permit application.
2. The Permittee may only store the hazardous wastes identified in Attachment C-1 of the approved permit application in the container storage area. A maximum of 13,200 gallons of hazardous waste may be stored in the container storage area. The hazardous waste codes for those wastes are listed in Attachment A to this permit.
3. The Permittee is prohibited from storing hazardous waste in the secondary containment area that is not identified in Condition B. 2. above.
4. Prior to the first shipment of hazardous waste from a new customer, to the facility, the Permittee shall obtain a representative sample of the waste stream and conduct preliminary assessment of the waste. This preliminary assessment shall include analysis of a waste sample for specific gravity, pH, ignitability and a visual inspection of a full depth sample, using a coliwasa, to determine color and phases. A representative sample obtained from each drum of waste shall be analyzed for specific gravity, pH, ignitability, flammability and visual inspection in accordance with the

approved waste analysis plan. The results of all laboratory analyses shall be recorded in the facility operating record. For each analysis, the operating record shall also indicate who obtained the sample, the date of the sampling, and the sampling procedures used.

5. The Permittee shall only accept wastes with a specific gravity greater than or equal to 0.80 and less than or equal to 1.68.
6. Prior to storing containers of waste in the hazardous waste container storage area, all containers shall be visually inspected and analyzed for specific gravity and the results compared to the one recorded during the preliminary assessment. In addition, at least 10% of all containers listed on a line item of a manifest shall be screened according to the flammability test method ASTM Method D4982-89. If the composite sample is flammable or even slightly flammable, all the drums within that composite shall be analyzed for flammability. Any drum that is flammable or even slightly flammable shall be analyzed for ignitability (ASTM Method D3278-89) and the results compared to the one recorded during the preliminary assessment. If a discrepancy is found, the waste shall not be accepted at the facility prior to reanalysis. If the ignitability and visual inspection are consistent with previous analysis, the containers may be stored at the facility.
7. Analysis for organics shall include all of the hazardous constituents for the volatile organics identified in Attachment A to this permit.
8. Samples which will be tested for volatile organics shall not be composited because of the volatilization which may result from any compositing method.
9. The permittee shall categorize all waste streams based on the process and types of metals cleaned as described in the approved permit application. Once more than 10 waste streams are included in a category, the permittee may reduce periodic testing/retesting as defined in Condition II.B.13. The permittee shall maintain a list of waste streams that have not been tested in the last 5 years. Waste streams from that pool (list) are to be randomly tested at a rate of 10% for each Categorical Waste Generator Listing category every other year. The permittee shall maintain a current Categorical Waste Generator Listing by adding or removing waste streams from the list as part of a monthly update.
10. As part of the waste acceptance procedure, the permittee shall review each profile sheet to determine if the generator can fit into one of the statistically established categories using the procedures defined in the approved permit application. If the generator opts to use the categorical listing rather than running a new analysis, the permittee shall

manage the waste in accordance with the LDR classification and waste characteristics associated with that category. The permittee shall update the profile and the LDR to include the LDR classification and waste characteristics associated with that category.

11. If the generator does not fit into one of the existing statistically established categories, or the generator prefers not to use the categorical listing, the permittee shall not accept the waste without documenting compliance with the requirements of 35 Ill. Adm. Code 728.107 using one of the following methods 1) performing analysis 2) obtaining analysis from the generator that identifies concentrations of underlying constituents, or 3) a generator certification based on adequate generator knowledge of the underlying constituents. The certification must include the method used to make this determination.
12. For those categories as identified using procedures in the approved waste analysis plan that are not yet statistically established, 100% of the waste streams shall be tested as required by condition II.B.13
13. Every five (5) years a sample from each waste stream from each customer shall be sent off-site to the laboratory for analysis of specific gravity, organics, ignitability, and total metals, unless the process generating the waste changes prior to that time. If the process generating the waste changes, the waste shall not be accepted at the facility prior to reanalysis.
  - a. For existing customers on the effective date of this permit, the first such analysis shall be conducted as follows:
    1. If the generator or the Permittee has conducted such an analysis within the last two (2) years prior to the effective date of this permit, then the next analysis shall be conducted not later than five (5) years from the date of such analysis.
    2. If the generator or the Permittee has not conducted such an analysis as set forth above, and the Permittee is storing the waste stream from the generator on the effective date of this permit, then such analysis shall be conducted within twelve (12) months from the effective date of this permit.
    3. If the generator or the Permittee has not conducted such an analysis as set forth in Condition I.B.9.a.1 above and the Permittee is not storing the waste stream from the customer on the effective date of this permit, then such analysis shall be conducted within twelve (12) months from the date

of receipt of the first delivery of the waste stream from the generator following the effective date of this permit.

- b. For new customers obtained after the effective date of this permit, such analysis shall be conducted within five (5) years after the preliminary assessment or within five (5) years of the analysis conducted by the generator, whichever is earlier.
- 14. Analysis for ignitability shall be conducted in accordance with ASTM D-93 or ASTM D-3228 (35 IAC Section 721.121 (a)(1)). Analysis for flammability shall be conducted in accordance with ASTM D4982-89.
- 15. A coliwasa sampler or similar device shall be used to obtain a representative sample from each drum.
- 16. A maximum of 579 55-gallon product, non-hazardous waste and empty containers may be maintained within the secondary containment system. The containers shall only contain the hazardous constituents permitted for storage in the hazardous waste storage area and shall not contain materials that are incompatible with any waste or other materials stored nearby in other containers unless separated from the other material and protected from them by means of a dike, berm, wall, or other devices. In addition, containers of ignitable and combustible (NFPA definition) product shall not be stored in the secondary containment area.
- 17. Calibration procedures for monitoring equipment shall be conducted in accordance with the latest edition of SW-846.
- 18. Ignitable, reactive and/or corrosive wastes shall not be accepted.
- 19. A maximum combination of 300 55-gallon drums of product and/or non-hazardous waste may be stored in the hazardous waste container storage area in accordance with Detrex's state operating Permit. The drums must be stacked 2-high.
- 20. Incoming waste must be shipped off-site or placed in permitted storage within 24 hours of the shipment arriving on-site.
- 21. The waste in containers may not be consolidated or combined.
- 22. An aisle space of 30 inches must be maintained in the container storage area.

23. Non-bulk containers that are empty or contain non-hazardous waste or product may be stacked to a maximum of 3-high.
24. Containers may be stacked provided that:
  - a. Only the same size or smaller containers are stacked on top of the containers beneath, and;
  - b. Containers are separated by a pallet or other dunnage to provide stability; or
  - c. Stacked in a staggered fashion.
25. Containers may be stored a maximum of ten (10) feet high provided the following inspection and record keeping procedures are used:
  - a. The containers shall be clearly marked with the date received prior to being placed into storage.
  - b. The date on each container must be clearly visible from the ground level inspection aisle, or in the event a group of containers arrives on site shrink wrapped or banded together and are not separated prior to storage, the date may be marked on the group in lieu of each individual container, provided the date is clearly visible from the ground level inspection aisle.
  - c. Each container stacked in an arrangement which is greater than 6.5 feet high shall be inspected daily for the following concerns:
    - i. Condition of the containers.
    - ii. Structural integrity of the containers.
    - iii. Signs of leakage.
    - iv. Missing bungs/tops.
    - v. Signs of corrosion.
    - vi. Stability of the pile.
    - vii. Visibility and readability of the label and date received.

26. The inspection identified in II(B)(21) above shall be conducted from a freestanding ladder, scaffold or other free standing device which allows the inspector to view the top of the containers (i.e., greater than 10 feet).
27. No container shall be stacked within this arrangement in a manner which compromises the integrity of the package.

C. CONDITION OF CONTAINERS –

1. If a container holding hazardous waste or product which is being stored in the hazardous waste secondary containment system is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee must transfer the hazardous waste or product from this container to a container that is in good condition or manage the waste in accordance with the approved permit application.
2. Any transfer of waste which was required to comply with I(C)(1), shall be recorded in the facility's operating record.
3. Packaging of all wastes accepted for storage in the container storage area shall meet the requirements of 49 CFR 172, 178 and 179 and all applicable D.O.T. and N.F.P.A. regulations. All containers shall be labeled or placarded (non-bulk vs. bulk) in accordance with 49 CFR 172.
4. The contents of each container shall be clearly identified on the side of the container in accordance with 49 CFR 172 prior to being placed in the container storage area.

D. COMPATIBILITY OF WASTE WITH CONTAINERS -- The Permittee must use a container made of or lined with material which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

E. MANAGEMENT OF CONTAINERS -- The Permittee shall comply with the following management practices:

1. A container holding hazardous waste or product which is being stored in the hazardous waste secondary containment system must always be closed during storage, except when it is necessary to add or remove waste.
2. A container holding hazardous waste or product which is being stored in the hazardous waste secondary containment system must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

F. INSPECTION

The Permittee shall inspect the container area daily, in accordance with the inspection schedule, specified in Attachment F-2, to detect leaks and deterioration of containers. The containment system shall be inspected weekly and repaired or recoated as soon as possible, if the inspection determines the concrete sealant has deteriorated. The Permittee shall perform a complete inspection of the concrete sealant yearly and perform annual maintenance to insure the integrity of the lining.

G. CONTAINMENT -- The Permittee shall construct, operate, and maintain the containment system according to the design plans and operating specifications contained in the approved permit application.

H. CLOSURE -- At closure, at a minimum, all hazardous waste and hazardous waste residues and constituents must be removed from the containment system. Remaining wastes, liners, bases, soil and groundwater containing or contaminated with hazardous waste, hazardous waste residue or hazardous constituents must be decontaminated or removed. Closure of the container storage area shall be carried out in accordance with the closure plan in the approved permit application, as modified below:

1. The Permittee shall notify Illinois EPA's DLPC in writing of its intent to close the container storage area at least 180 days prior to the date closure is expected to begin. Along with this notification, the Permittee shall submit a sampling and analysis plan to be used in demonstrating the storage area has been properly decontaminated. This plan must be approved by Illinois EPA's DLPC in writing prior to being implemented. Illinois EPA review of this plan will be subject to the permit appeal provisions contained in Sections 39(a) and 40(a) of the Illinois Environmental Protection Act. The response from Illinois EPA will approve and establish:
  - a. The sampling and decontamination plan;
  - b. What contaminants must be analyzed for;
  - c. Analytical requirements (SW-846 Methods should be utilized); and
  - d. The level at which decontamination or removal is considered complete.
2. All sweepings, wash water and rinsate generated during the closure of the unit shall be managed as a hazardous waste, unless it can be shown to be exempt under 35 IAC Part 721.

3. The Permittee shall provide post-closure care in accordance with 35 IAC Part 724 for the container storage area if all of the hazardous wastes or contaminated material or media cannot be practicably removed or decontaminated in accordance with the closure requirements outlined in the permit and in the approved closure plan. If it is determined that the closure requirements cannot be met and post-closure care is required, this Permit must be modified to require post-closure care in accordance with 35 IAC, Subtitle G, Part 724, Subparts G and H.
4. Should post-closure care, as described above, become necessary, the Permittee shall submit an application for modification to this permit, including an amended closure and post-closure care plan for this unit, within thirty (30) days following discovery that clean closure cannot be accomplished. If a determination is made to not pursue clean closure prior to the implementation of the closure plan, the modification request shall be made no later than sixty (60) days after the determination is made.
5. Financial assurance for closure and post-closure of the container storage area, if required, shall be provided within thirty (30) days following modification of the permit.
6. Within sixty (60) days after closure of the container storage area is complete, the Permittee shall submit certification to Illinois EPA that the unit has been closed in accordance with the approved closure plan.

The closure certification forms in Attachment B to this permit or a certification with identical wording must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer (registered in the State of Illinois) should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the area(s) until Illinois EPA approves the closure certification for the unit. Illinois EPA's review of closure certification for partial or final closure will be conducted in accordance with 35 IAC 724.243.

A Closure Documentation Report is to be submitted with the closure certification which includes the following items, if applicable:

- a. The volume of waste and waste residue removed, including wastes resulting from decontamination activities.
- b. A description of the method of waste handling and transport.



- c. Copies of the waste manifests.
  - d. A description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information.
  - e. A chronological summary of closure activities and the cost involved.
  - f. Tests performed, methods and results.
  - g. Color photographs of closure activities which document conditions before, during and after closure.
  - h. A scale drawing of all excavated or decontaminated areas and sample locations.
7. To avoid creating another regulated storage unit during closure, it is recommended that you obtain any necessary permits for waste disposal prior to initiating excavation activities. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The ninety (90) day accumulation time exemption (35 IAC 722.134) only applies to containers and tanks.
8. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.
9. If Illinois EPA determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 724.211, Illinois EPA reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
10. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store on-site generated

hazardous waste in containers or tanks pursuant to 35 IAC 722.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).

I. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials in the same container.

Incompatible wastes or materials must not be placed in the same container to prevent reactions which:

- a. Generate extreme heat or pressure, fire or explosions, or violent reactions
- b. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment
- c. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions
- d. Damage the structural integrity of the device or facility
- e. Through other like means, threaten human health or the environment.

The basic methods for preventing such reactions are to:

- a. Treat one or both of the incompatible wastes/materials to render them compatible prior to placing them in the container
  - b. Physically separate the incompatible wastes/materials in the containers so that it is not possible for the incompatible wastes/materials to come in contact with each other.
2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.
  3. The Permittee shall not store containers holding a hazardous waste or product that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments unless separated from the other material or protected from them by means of a dike, berm, wall, or other devices.

J. CONTINGENCY PLAN - ADDITIONAL SPECIAL CONDITIONS

1. The Permittee shall implement the facility contingency plan contained in the approved permit application any time there is (1) a release of hazardous waste or hazardous constituents which could threaten human health or the environment, (2) a release of hazardous waste or hazardous constituents which is equal to or greater than the Reportable Quantity (RQ), (3) a fire or explosion which involves hazardous waste or which occurs in areas where hazardous wastes are stored, or (4) a release of hazardous waste or hazardous waste constituents which, based on the air dispersion modeling results contained in the contingency plan, would be expected to result in exposure above an OSHA short term exposure limit to unprotected persons. (This would not apply to responding personnel who employ the proper personal protective equipment (PPE)).
2. The Permittee shall contact the local emergency response entities as soon as possible after implementation of the contingency plan:
  - a. The entities which must be notified include:
    1. Melrose Park Fire Department
    2. Melrose Park Police Department
    3. Local ESDA Coordinator
    4. Illinois Emergency Management Agency
  - b. The information which must be initially relayed to each entity includes:
    1. The type of emergency (release, fire or explosion);
    2. The type of wastes or product involved in the emergency and the approximate quantity involved;
    3. An initial assessment of the conditions at the site;
  - c. If the Permittee is able to properly respond to the emergency without any aid from the entities identified in Condition 2.a above, the Permittee shall notify each of these entities that the emergency situation no longer exists once all required emergency response and cleanup activities have been completed. This condition does not preclude the need to initially notify the entities in 2.a above.

3. The Permittee shall review all components of the contingency plan with the local emergency response entities at least once every twelve months. Copies of the meeting notes and list of attendees shall be placed in the facility's operating record and be available to Illinois EPA for review upon verbal or written request.

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SECTION III  
STANDARD CONDITIONS  
GENERAL REQUIREMENTS

1. EFFECT OF PERMIT. The existence of a RCRA permit shall not constitute a defense to a violation of the Environmental Protection Act or Subtitle G, except for development, modification or operation without a permit. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of state or local law or regulations. (35 IAC 702.181)
2. PERMIT ACTIONS. This permit may be modified, reissued or revoked for cause as specified in 35 IAC 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittee for a permit modification or revocation, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. (35 IAC 702.146)
3. SEVERABILITY. The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby. (35 IAC 700.107)
4. PERMIT CONDITION CONFLICT. In case of conflict between a special permit condition and a standard condition, the special condition will prevail. (35 IAC 702.160)
5. DUTY TO COMPLY. The Permittee shall comply with all conditions of this permit except for the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of the Environmental Protection Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application. (35 IAC 702.141 and 703.242)
6. DUTY TO REAPPLY. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must apply for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by Illinois EPA. (35 IAC 702.142 and 703.125)
7. PERMIT EXPIRATION. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see 35 IAC 703.181-703.209) and through no fault of the Permittee Illinois EPA has not issued a new permit as set forth in 35 IAC 702.125.

8. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (35 IAC 702.143)
9. DUTY TO MITIGATE. In the event of noncompliance with the permit, the permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
10. PROPER OPERATION AND MAINTENANCE. The Permittee shall at all times properly operate and maintain all facilities and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit. (35 IAC 702.145)
11. DUTY TO PROVIDE INFORMATION. The Permittee shall furnish to Illinois EPA, within a reasonable time, any relevant information which Illinois EPA may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to Illinois EPA, upon request, copies of records required to be kept by this permit. (35 IAC 702.148)
12. INSPECTION AND ENTRY. The Permittee shall allow an authorized representative of Illinois EPA, upon the presentation of credentials and other documents as may be required by law, to:
  - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

- d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location. (35 IAC 702.149)

13. MONITORING AND RECORDS. (35 IAC 702.150)

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from Appendix A of 35 IAC 721. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method as specified in the approved Waste Analysis Plan.
- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or application. These periods may be extended by request of Illinois EPA at any time. The permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.
- c. Records of monitoring information shall include:
  - i. The date(s), exact place, and time of sampling or measurements;
  - ii. The individual(s) who performed the sampling or measurements;
  - iii. The date(s) analyses were performed;
  - iv. The individual(s) who performed the analyses;
  - v. The analytical technique(s) or method(s) used; and
  - vi. The result(s) of such analyses. (35 IAC 702.150)

14. REPORTING PLANNED CHANGES. The permittee shall give notice to Illinois EPA as soon as possible of any planned physical alterations or additions to the permitted facility. For a new HWM facility, the permittee may not commence treatment, storage or disposal of

hazardous waste; and for a facility being modified the permittee may not treat, store or dispose of hazardous waste in the modified portion of the facility, until:

- a. The permittee has submitted to Illinois EPA by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
- b.
  - 1. Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the permit; or
  - 2. If, within 15 days of the date of submission of the letter in paragraph (a), the permittee has not received notice from Illinois EPA of its intent to inspect, prior inspection is waived and the permittee may commence treatment, storage or disposal of hazardous waste. (35 IAC 703.244 and 702.152(a))

15. ANTICIPATED NONCOMPLIANCE. The Permittee shall give advance notice to Illinois EPA of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. For a new facility, the permittee shall not treat, store or dispose of hazardous waste; and for a facility being modified, the permittee shall not treat, store or dispose of hazardous waste in the modification portion of the facility, except as provided in Section 703.280, until:

- i. The permittee has submitted to Illinois EPA by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
- ii. Either:
  - a. Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or
  - b. Within 15 days after the date submission of the letter in section i above, the permittee has not received notice from Illinois EPA of its intent to inspect, the permittee may commence treatment, storage or disposal of hazardous waste. (35 IAC 702.152(b) and 703.247)

16. TRANSFER OF PERMITS. This permit is not transferable to any person except after notice to Illinois EPA. Illinois EPA may require modification of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the appropriate Act. (See Sections 703.260 and 703.270, in some cases modification is mandatory.) (35 IAC 702.152(c))



17. MONITORING REPORTS. Monitoring results shall be reported at the intervals specified in the permit. (35 IAC 702.152(d))
18. COMPLIANCE SCHEDULES. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than specified in 35 IAC 702.162. (35 IAC 702.152(e))
19. TWENTY-FOUR HOUR REPORTING.
  - a. The Permittee shall report to Illinois EPA any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the following circumstances. This report shall include the following:
    - i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
    - ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the HWM facility, which could threaten the environment or human health outside the facility.
  - b. The description of the occurrence and its cause shall include:
    - i. Name, address, and telephone number of the owner or operator;
    - ii. Name, address, and telephone number of the facility;
    - iii. Date, time, and type of incident;
    - iv. Name and quantity of material(s) involved;
    - v. The extent of injuries, if any;
    - vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
    - vii. Estimated quantity and disposition of recovered material that resulted from the incident.
  - c. A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a

description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. Illinois EPA may waive the five day written notice requirement in favor of a written report within fifteen days. (35 IAC 702.152(f) and 703.245(b))

20. OTHER NONCOMPLIANCE. The Permittee shall report all instances of noncompliance not otherwise required to be reported under Standard Conditions 17, 18, and 19, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in Standard Condition 19. (35 IAC 702.152(g))
21. OTHER INFORMATION. Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to Illinois EPA, the Permittee shall promptly submit such facts or information. (35 IAC 702.152(h))
22. REPORTING REQUIREMENTS. The following reports required by 35 Ill. Adm. Code 724 shall be submitted in addition to those required by 35 Ill. Adm. Code 702.152 (reporting requirements):
  - a. Manifest discrepancy report: if a significant discrepancy in a manifest is discovered, the permittee must attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within 15 days after receiving the waste, the permittee must immediately submit to Illinois EPA a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. (35 IAC 724.172(b))
  - b. Unmanifested waste report: The permittee must submit to Illinois EPA within 15 days of receipt of unmanifested waste an unmanifested waste report on EPA form 8700-13B. (35 IAC 724.176)
  - c. Annual report: an annual report must be submitted covering facility activities during the previous calendar year. (35 IAC 724.175)
23. SUBMITTAL OF REPORTS OR OTHER INFORMATION. All written reports or other written information required to be submitted by the terms of this permit shall be sent to:

Illinois Environmental Protection Agency  
Division of Land Pollution Control #24  
Planning and Reporting Section  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276

24. SIGNATORY REQUIREMENT. All permit applications, reports or information submitted to Illinois EPA shall be signed and certified as required by 35 IAC 702.126. (35 IAC 702.151)
25. CONFIDENTIAL INFORMATION. Any claim of confidentiality must be asserted in accordance with 35 IAC 702.103 and 35 IAC 161.
26. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE. The Permittee shall maintain at the facility, until closure is complete, the following documents and amendments, revisions and modifications to these documents:
  - a. Waste analysis plan as required by 35 IAC 724.113(b) and this permit.
  - b. Personnel training documents and records as required by 35 IAC 724.116(d) and this permit.
  - c. Contingency plan as required by 35 IAC 724.153(a) and this permit.
  - d. Closure plan as required by 35 IAC 724.212(a) and this permit.
  - e. Cost estimate for facility closure as required by 35 IAC 724.242(d) and this permit.
  - f. Operating record as required by 35 IAC 724.173 and this permit.
  - g. Inspection schedules as required by 35 IAC 724.115(b) and this permit.
27. WASTE MINIMIZATION. The Permittee shall certify at least annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment, in accordance with 35 IAC 724.173(b)(9).

#### GENERAL FACILITY STANDARDS

28. NOTICE OF WASTE FROM A FOREIGN SOURCE. The permittee who has arranged to receive hazardous waste from a foreign source must notify Illinois EPA in writing at least four weeks in advance of the date the waste is expected at the facility. (35 IAC 724.112(a))
29. NOTICE OF WASTE FROM OFF-SITE. The Permittee who receives hazardous waste from an off-site source (except where the Permittee is also the generator), must inform the generator in writing that the permittee has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the facility operating record. (35 IAC 724.112(b))
30. GENERAL WASTE ANALYSIS. The Permittee shall comply with the procedures described in the approved waste analysis plan. (35 IAC 724.113)
31. SECURITY. The Permittee shall comply with the security provisions of 35 IAC 724.114(b) and (c).
32. GENERAL INSPECTION REQUIREMENTS. The Permittee shall follow the approved inspection schedule. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 35 IAC 724.115(c). Records of inspections shall be kept as required by 35 IAC 724.115(d).
33. PERSONNEL TRAINING. The Permittee shall conduct personnel training as required by 35 IAC 724.116 and shall maintain training documents and records as required by 35 IAC 724.116(d) and (e).
34. GENERAL REQUIREMENTS. The Permittee shall not store ignitable, reactive, or incompatible wastes at the facility.

#### PREPAREDNESS AND PREVENTION

35. DESIGN AND OPERATION OF FACILITY. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (35 IAC 724.131)
36. REQUIRED EQUIPMENT. The Permittee shall equip the facility with the equipment set forth in the approved contingency plan, as required by 35 IAC 724.132.

37. TESTING AND MAINTENANCE OF EQUIPMENT. The Permittee shall test and maintain the equipment specified in condition 36 as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the approved inspection schedule. (35 IAC 724.133)
38. ACCESS TO COMMUNICATIONS OR ALARM SYSTEM. The Permittee shall maintain access to the communications or alarm system as required by 35 IAC 724.134.
39. REQUIRED AISLE SPACE. The Permittee shall maintain aisle space as required by 35 IAC 724.135 and National Fire Protection Association (NFPA) requirements.
40. ARRANGEMENTS WITH STATE AND LOCAL AUTHORITIES AND EMERGENCY RESPONSE CONTRACTORS. The Permittee shall attempt to make emergency response arrangements with State and local authorities and agreements with State emergency response teams and emergency response contractors and equipment suppliers as required by 35 IAC 724.137. If State or local officials refuse to enter in preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

#### CONTINGENCY PLAN

41. IMPLEMENTATION OF PLAN. The provisions of the contingency plan must be carried out by the Permittee immediately whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (35 IAC 724.151(b)). Within 15 days of any incident that requires implementation of the contingency plan, the owner or operator must submit a written report to Illinois EPA as required by 35 IAC 724.156(j).
42. COPIES OF PLAN. A copy of the contingency plan, including any revisions, must be maintained at the facility and submitted to all local police and fire departments, hospitals and state and local emergency response teams as required by 35 IAC 724.153.
43. AMENDMENTS TO PLAN. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 35 IAC 724.154.
44. EMERGENCY COORDINATOR. A trained emergency coordinator shall be available at all times in case of an emergency as required by 35 IAC 724.155 and 724.156.

#### MANIFEST SYSTEM RECORD KEEPING AND REPORTING

45. MANIFEST SYSTEM. The Permittee shall comply with the manifest requirements of 35 IAC 724.171, 724.172 and 724.176.
46. OPERATING RECORD. The Permittee shall maintain a written operating record at the facility in accordance with 35 IAC 724.173.
47. ANNUAL REPORT. The Permittee shall prepare and submit an annual report to Illinois EPA prior to March 1st of each year in accordance with the requirements of 35 IAC 724.175.

#### CLOSURE

48. PERFORMANCE STANDARD. The Permittee shall close the facility as required by 35 IAC 724.211 and in accordance with the approved closure plan.
49. AMENDMENT TO CLOSURE PLAN. The Permittee must amend the closure plan whenever there is a change in the expected year of closure or whenever a change in the facility operation plans or facility design affects the closure plan pursuant to 35 IAC 724.212(c).
50. NOTIFICATION OF CLOSURE. The Permittee shall notify Illinois EPA at least 60 days prior to the date it expects to begin closure. (35 IAC 724.212(d))
51. TIME ALLOWED FOR CLOSURE. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste and complete closure activities in accordance with the schedule(s) specified in the closure plan. (35 IAC 724.213)
52. DISPOSAL AND/OR DECONTAMINATION OF EQUIPMENT. When closure is completed, the Permittee shall decontaminate and/or dispose of all facility equipment and structures as required by the approved closure (35 IAC 724.214) plan.
53. CERTIFICATION OF CLOSURE. When closure is completed, the Permittee shall submit certification to Illinois EPA in accordance with 35 IAC 724.215 that the facility has been closed as specified by the approved closure plans.
54. COST ESTIMATE FOR FACILITY CLOSURE. The Permittee's original closure cost estimate, prepared in accordance with 35 IAC 724.242, must be:

- a. Adjusted for inflation either 60 days prior to each anniversary of the date on which the first closure cost estimate was prepared or if using the financial test or corporate guarantee, within 30 days after close of the firm's fiscal year.
  - b. Revised whenever there is a change in the facility's closure plan increasing the cost of closure.
  - c. Kept on record at the facility and updated. (35 IAC 724.242)
55. FINANCIAL ASSURANCE FOR FACILITY CLOSURE. The Permittee shall demonstrate compliance with 35 IAC 724.243 by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by the previous Permit Condition. Changes in financial assurance mechanisms must be approved by Illinois EPA pursuant to 35 IAC 724.243.
56. LIABILITY REQUIREMENTS. The Permittee shall demonstrate continuous compliance with the requirements of 35 IAC 724.247 and the documentation requirements of 35 IAC 724.251.
57. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS. The Permittee shall comply with 35 IAC 724.248 whenever necessary.

#### LAND DISPOSAL RESTRICTIONS

58. DISPOSAL PROHIBITION. Any waste identified in 35 IAC Part 728, Subpart C, or any mixture of such a waste with non-restricted wastes, is prohibited from land disposal unless it meets the standards of 35 IAC Part 728, Subpart D, or unless it meets the requirements for exemptions under Subpart C. "Land disposal" means placement in or on the land and includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, or vault intended for disposal.
59. DILUTION PROHIBITION. The Permittee shall not in any way dilute a restricted waste or residual from treatment of a restricted waste as a substitute for adequate treatment in order to achieve compliance with 35 IAC 728, Subpart D (35 IAC 728.103).
60. WASTE ANALYSIS.
1. The Permittee must test his waste or extract developed, using the test method identified in Appendix I of 40 CFR Part 268, or use knowledge of the waste, to determine if the waste is restricted from land disposal.

2. For any waste with treatment standards expressed as concentrations in the waste extract, the Permittee must test the treatment residues or an extract of such residues developed using the test method described in Appendix I of 40 CFR Part 268, to assure that the treatment residues or extract meet the applicable treatment standard.
3. If the treatment residues do not meet the treatment standards, or if the Permittee ships any restricted wastes to a different facility, the Permittee shall comply with the requirements applicable to generators in 35 IAC 728.107 and 728.150(a)(1).

#### 61. STORAGE RESTRICTIONS

1. The Permittee shall not store hazardous wastes restricted from land disposal under 35 IAC Part 728, Subpart C unless such wastes are stored only in containers or tanks, and are stored solely for the purpose of the accumulation of such quantities as is necessary to facilitate proper recovery, treatment, or disposal, and: (1) each container is clearly marked to identify its contents and the date each period of accumulation begins; (2) each tank is clearly marked to identify its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, as required by 35 IAC 728.150.
2. The Permittee must comply with the operating record requirements of 35 IAC 724.173.

#### 62. NEW DETERMINATIONS OF PROHIBITED WASTES

Wastes which are prohibited from land disposal under 35 IAC Part 728, Subpart C, or for which treatment standards have been established under 35 IAC 728, Subpart D, subsequent to the date of issuance of this permit, shall be subject to the conditions number 58 through 61 above.



SECTION IV  
CORRECTIVE ACTION

A. INTRODUCTION

In accordance with Section 3004 of RCRA and 35 IAC 724.201, the Permittee shall institute such corrective action as necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents from any solid waste management unit (SWMU) at its facility in Melrose Park, Illinois. This shall be accomplished by:

1. Completing a RCRA Facility Investigation (RFI) to determine whether releases of hazardous wastes and hazardous constituents have occurred from any solid waste management unit (SWMU) at its facility, and if so, the nature and extent of the release(s).
2. Based upon the results of the RFI, developing and implementing a Corrective Measures Program, which describes the necessary corrective measures, which will be taken. The required corrective measures shall be those measures necessary to protect human health and the environment from all releases of hazardous wastes or hazardous constituents, listed in Appendix H of 35 IAC Part 721, from any of the SWMUs determined to pose an environmental threat by the RFI required under the terms and conditions of this permit.

B. CONDUCTING THE RCRA FACILITY INVESTIGATION

The Permittee must conduct a RCRA Facility Investigation (RFI) to determine the nature and extent of releases of hazardous wastes and hazardous constituents from certain SWMUs at the subject facility.

1. An RFI Phase I workplan for this facility was approved by Illinois EPA on June 17, 1993, modifications to this plan were approved by Illinois EPA on September 10, 1993. The solid waste management units to be investigated were:
  - a. Waste Handling Area (SWMU #1)
  - b. Fuel Spill Area (SWMU #2)
  - c. Tank Car Unloading Area (SWMU #3)

d. Potential UST Area (SWMU #4)

A drawing showing the location of these units within the facility is provided in Attachment D-1.

2. A report documenting the results of the Phase I RFI was approved by Illinois EPA on June 15, 1994. The results of the Phase I RFI indicated that additional investigation was necessary to fully characterize the extent of the releases of the 4 SWMUs of concern.
3. An RFI Phase II workplan for the 4 SWMUs of concern was approved by Illinois EPA on January 27, 1995.
4. On July 18, 1996, Illinois EPA approved a report documenting the results of the initial stage of the RFI Phase II. Additional RFI Phase II investigative efforts were also approved.
5. On January 22, 1997, Illinois EPA approved a Scope of Work for Stage II of Phase II RFI.
6. Detrex has submitted reports entitled "Phase II Stage II Investigative Summary and Tier 1 Screening Evaluation" and "Tier 2 TACO Analysis for Detrex RCRA Facility" which are currently under review by Illinois EPA.
7. The Agency's DLPC will review the data contained in the reports identified in Condition B.6 above and notify the Permittee in writing of the results.
  - a. If the Agency determines that there is a potential that groundwater has been impacted by a release of hazardous wastes or hazardous constituents from any SWMU evaluated during the Phase I or Phase II investigation, then the Permittee must conduct Phase III of the RFI for such SWMUs. The purpose of the Phase III investigation of the RFI will be to (1) determine if groundwater has been impacted at such SWMUs and (2) the extent of any detected release. The requirements associated with a Phase III Investigation are contained in Attachment D-2 to this permit.
  - b. If the Agency's DLPC determines that a RFI Phase III investigation is not required, based on data obtained from the RFI Phase II investigation, the Agency reserves the right to require that corrective measures be conducted for the SWMU(s) of concern to address releases identified through the Phase I and Phase II investigations.

- c. The Agency's response to the Phase II report will:
    - i. Identify those SWMUs for which Phase III of the RFI must be conducted; and,
    - ii. Identify those SWMUs and associated environmental media for which corrective action is required, although no Phase III investigation is required.
  - d. Agency action on the final RFI Phase II report will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.
8. Within 90 days of notification of the need for a Phase III investigation, the Permittee shall submit a plan for conducting Phase III of the RFI. The Scope of Work which should be followed in developing this work plan is provided in Attachment D-2. The Agency's DLPC will approve, modify and approve, or disapprove and provide comments to the Permittee as to the corrections or modifications needed for the RFI Phase III Workplan.
- a. Within 60 days of receipt of such comments, the Permittee must modify the plan or submit a new plan for the Agency's DLPC approval.
  - b. Within 60 days of the Agency's DLPC approval of the RFI Phase III Workplan, the Permittee shall begin implementing the plan according to the terms and schedule established within the Workplan.
  - c. Agency action on the Phase III workplan will be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.
9. The Permittee must submit a report documenting the efforts carried out in accordance with the approved RFI Phase III Workplan in accordance with the schedule set forth in that workplan.
10. Following submittal of the RFI Phase III report, the Agency's DLPC will review the data contained in the report and notify the Permittee in writing of the results.
- a. If the Agency determines that there has been a release of hazardous waste or hazardous constituents from a SWMU to the groundwater, then the Permittee must perform corrective measures, as necessary, to protect human health and the environment. Additional corrective measures will also be required to address the source of the groundwater contamination of the groundwater.

- b. If the Agency determines that there (1) has not been a release of hazardous waste or hazardous constituents from a SWMU to the groundwater and (2) is no potential for releases of hazardous waste or hazardous constituents from a SWMU to the groundwater, then no corrective measures will be required at that SWMU relating to groundwater. However, corrective measures may be necessary to address the waste and/or contaminated soil present at the SWMU.
- c. If the Agency determines that (1) there has not been a release of hazardous waste or hazardous constituents from a SWMU to the groundwater (2) but there is a potential for future releases of hazardous waste or hazardous constituents from a SWMU to the groundwater, then the Agency may require a longer term groundwater monitoring program at any SWMU where substantial soil contamination exists (as determined by the Agency), or at any SWMU which would meet the definition of a land disposal unit. This additional monitoring need for this is dependent on the corrective action taken in response to the waste and/or contaminated soil present at the SWMU.
- d. The Agency's response to the Phase III report will:
  - i. Identify those SWMUs investigated as part of Phase III of the RFI from which there has been a release of hazardous waste or hazardous constituents to groundwater that requires corrective measures;
  - ii. Identify those SWMUs investigated as part of Phase III of the RFI for which no corrective measures is required for groundwater at this time;
  - iii. Identify those land-based SWMUs investigated as part of the Phase III RFI for which a longer term groundwater monitoring program must be established as a corrective measure. "Land-based SWMUs" are SWMUs where waste, contaminated soil and/or contaminated groundwater are allowed to remain in-place.
- e. Agency action on the Phase III Workplan will be subject to the appeal provisions of Sections 39(a) of the Illinois Environmental Protection Act.

C. CORRECTIVE MEASURE REQUIREMENTS

- 1. If it is determined that corrective measures must be taken in response to any SWMU investigated during the RFI, then the Permittee shall implement a Corrective Measures Program (CMP) for such SWMUs. The corrective measures implemented by the Permittee must be sufficient to ensure the requirements of 35 Ill. Adm. Code 302, 620,

724 and 742 are met. The requirements for implementing a CMP are set forth in Attachment D-3.

- a. A Phase I CMP report, or its equivalent, must be submitted to Illinois EPA within ninety (90) days of written notification of the need for implementation of a Corrective Measures Program.
  - b. Subsequent plans and reports must be submitted to Illinois EPA for review and approval in accordance with an approved schedule.
  - c. Phases must be combined and/or skipped, depending on the actual corrective measure selected. The overall CMP implemented at a given SWMU must: (1) be logical in nature; (2) meet the requirements set forth in Attachment !VAR!; and (3) allow for Illinois EPA oversight and approval throughout the entire process.
2. Illinois EPA action on all corrective measure program submittals shall be subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.

D. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

1. The Permittee shall prepare a cost estimate for the completion of any corrective action required under this permit, in order to provide financial assurance for completion of corrective action, as required under 35 IAC 724.201(b). Such a cost estimate will be based upon the cost of contamination investigations and assessments for the SWMU(s), and design, construction, operation, inspection, monitoring, and maintenance of the corrective measure(s) to meet the requirements of 35 IAC 724.201 and this permit. This cost estimate must be submitted to the Agency's DLPC with each RFI or CMP workplan.
2. The Permittee shall demonstrate continuous compliance with 35 IAC 724.201 by providing documentation of financial assurance using a mechanism specified in 35 IAC 724.243, in at least the amount of the cost estimate required under Condition the words "completion of corrective action" shall be substituted for "closure and/or post-closure", as appropriate in the financial instrument specified in 35 IAC 724.251. The documentation shall be submitted to the Agency's DLPC within 60 days after the Agency's approval of the initial or revised cost estimates required under Condition D.1. The Agency's DLPC may accept financial assurance for completion of corrective action in combination with another financial mechanism that acceptable under 35 IAC 724.246 at its discretion.

E. FUTURE RELEASES FROM SWMUs

There exists a potential that a release may occur in the future from SWMUs identified in the RFA which did not require any corrective action at the time that the RFA or RFI was completed. If the Permittee discovers that a release has occurred from such a SWMU in the future, then the Agency must be notified of this release within thirty (30) days after its discovery. Upon the Agency's written request, the Permittee shall implement a corrective action program for that SWMU in accordance with the procedures set forth in Subsections B and C above, beginning on the date of notification, rather than on the effective date of the permit.

F. NOTIFICATION REQUIREMENTS FOR AN ASSESSMENT OF NEWLY-IDENTIFIED SOLID WASTE MANAGEMENT UNIT(S)

1. The Permittee shall notify the Agency's DLPC in writing of any newly-identified SWMU(s) discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than sixty (60) calendar days after discovery. The notification shall provide the following information, as available:
  - a. The location of the newly-identified SWMU in relation to other SWMUs on a scaled map or drawing;
  - b. The type and past and present function of the unit;
  - c. The general dimensions, capacities, and structural description of the unit (available drawings and specifications provided);
  - d. The period during which the unit was operated;
  - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU, to the extent available; and
  - f. The results of any relevant available sampling and analysis which may aid in determining whether releases of hazardous wastes or hazardous constituents have occurred or are occurring from the unit.
2. If the submitted information demonstrates a potential for a release of hazardous waste or hazardous waste constituents from the newly identified SWMU, the Agency's DLPC may request in writing, that the Permittee prepare a Solid Waste Management Unit

(SWMU) Assessment Plan and a proposed schedule of implementation and completion of the Plan for any additional SWMU(s) discovered subsequent to the issuance of this Permit.

3. Within 90 calendar days after receipt of the Agency's DLPC request for a SWMU Assessment Plan, the Permittee shall submit a SWMU Assessment Plan consistent with the requirements of Subsection B above. This SWMU Assessment plan must also propose investigations, including field investigations if necessary, to determine the release potential to specific environmental media for the newly-identified SWMU. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste and hazardous constituents from the newly-discovered SWMU(s) to the environment.
4. After the Permittee submits the SWMU Assessment Plan, the Agency's DLPC shall either approve, approve with conditions or disapprove the Plan in writing. If the plan is approved, the Permittee shall begin to implement the Plan within forty-five (45) calendar days of receiving such written notification. If the Plan is disapproved, the Agency's DLPC shall notify the Permittee in writing of the Plan's deficiencies specify a due date for submittal of a revised plan.
5. The Permittee shall submit a report documenting the results of the approved SWMU Assessment Plan to the Agency's DLPC in accordance with the schedule in the approved SWMU Assessment Plan. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan.
6. The Permittee must implement a Corrective Measures Program, as necessary, to properly address any contamination encountered during the assessment. This program must be carried out in general accordance with the procedures set forth in Subsection C above.

G. INTERIM MEASURES

At any time during the RFI, the Permittee may initiate additional interim measures for the purpose of preventing continuing releases and/or mitigating the results of releases and/or mitigating the migration of hazardous wastes or hazardous constituents. It shall not be necessary to conduct all phases of the RFI investigation prior to implementing an interim measure if the Agency's DLPC and the Permittee agree that a problem can be corrected, or a release cleaned up, without additional study and/or without a formal CMS.

1. Prior to implementing any interim measures beyond those specified above, the Permittee must submit detailed information regarding the proposed interim measure to the Agency's DLPC for approval. This information shall include, at a minimum:
  - a. Objectives of the interim measures: how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long-term solution at the facility;
  - b. Design, construction, and maintenance requirements;
  - c. Schedules for design and construction; and
  - d. Schedules for progress reports.
2. If the Agency's DLPC determines that a release cannot be addressed without additional study and/or a formal CMS, then the Agency's DLPC will notify the Permittee that these must be performed. Any proposal made under this provision or any other activity resulting from such proposal, including the invocation of dispute resolution, shall not affect the schedule for implementation of the RFI or of any other portion of the permit.
3. If the Agency determines that interim measures are necessary to protect human health or the environment, the Permittee will be notified by way of a permit modification.



SECTION V  
REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA permit are summarized below. This summary is provided to highlight the various reporting and notification requirements of this permit.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
Section I: CONTAINER STORAGE		
H.1.	Notify Illinois EPA of intent to close container storage area.	At least 180 days prior to commencement of closure.
H.1.	Submit decontamination and/or soil sampling and analysis plan for review.	At least 180 days prior to commencement of closure.
H.4.	Submit application for modification of permit and closure and post-closure care plan.	No later than 60 days after determination that container storage area cannot be clean closed.
H.5.	Update financial assurance.	No later than 30 days after permit modification is effective.
H.6.	Submit certification for closure of container storage area.	No later than 60 days after closure of container storage area is complete.
Section II: STANDARD CONDITIONS		
6	Complete application for new permit.	At least 180 days prior to permit expiration.
11	Information requested by Illinois EPA and copies of records required to be kept by this permit.	Reasonable time.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
14	Notify Illinois EPA of planned physical alterations or additions.	At least 15 days prior to planned change.
15	Notify Illinois EPA of changes which may result in permit noncompliance.	
16	Application for permit modification indicating permit is to be transferred.	
18	Submission of any information required in a compliance schedule.	Within 14 days after each schedule date.
19	Report to Illinois EPA any non-compliance which may endanger health or environment.	
	telephone	Within 24 hours after discovery.
	in writing	Within 5 days after discovery.
20	Report all other instances of noncompliance.	March 1 of each year along with Annual Report.
28	Notify Illinois EPA in writing of expected receipt of hazardous waste from foreign source.	At least 4 weeks prior to receipt of waste.
41	Implementation of Contingency Plan.	
	Notify appropriate state and local agencies with designated response roles.	As needed.
	Notify appropriate local officials.	Immediately, if emergency coordinator's assessment indicates evacuation of local area is advisable.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
	Notify Illinois EPA (217/782-3637) or Illinois ESDA (217/782-7860) if emergency coordinator determines there has been a release, fire or explosion which could threaten human health or the environment, outside the facility.	Immediately after determination made.
	Notify Illinois EPA and appropriate state and local authorities, in writing that facility is in compliance with 35 IAC 724.156(h).	Prior to resuming operation in affected areas.
	Report to Illinois EPA details regarding incident which required implementation of contingency plan.	Within 15 days after event.
47	Submit annual report required by 35 IAC 724.175.	March 1 of each year.
49	Application for permit modification amending closure plan.	
50	Notify Illinois EPA that expecting to close.	At least 180 days prior to beginning closure.
54(a)	Adjust closure cost estimate for inflation.	Within 30 days after anniversary date.
54(b)	Revision of closure cost estimate.	As needed.
55	Change in financial assurance mechanism for closure.	
56	Change in coverage for sudden and non-sudden accidental occurrences.	

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
57	Notify Illinois EPA of commencement of voluntary or involuntary bankruptcy proceedings.	Within 10 days after commencement of proceeding.
Section III: CORRECTIVE ACTIONS		
B	RCRA Facility Investigation (RFI) Phase I Workplan	Within 90 days after the effective date of this permit.

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SECTION VI  
SPECIAL CONDITIONS

1. All hazardous and non-hazardous special wastes generated by this facility and transported off-site for recycling, treatment or disposal must be transported in accordance with the uniform permit or non-hazardous special waste hauling permit and Illinois manifest system, the applicable regulations in 35 IAC, Parts 709, 722, 723, 807 and 809.
2. Special wastes received at the site for storage/transfer shall be transported to the facility utilizing Illinois manifest system.
3. All loading/unloading of special wastes shall be accomplished over spill containment devices which are constructed of non earthen materials and have been coated with a compatible impermeable coating and has been sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation.
4. The permittee shall perform a complete inspection of the surface coating or lining yearly and perform annual maintenance to insure the integrity of the coating.
5. It shall not be an act of non-compliance if the coating or lining of the container storage area secondary containment system has been installed properly but does not live up to the manufacture's printed performance standards and/or if the coating or lining fails due to excessive wear or chemical breakdown. The Permittee shall notify Illinois EPA within thirty (30) days of becoming aware of the failure. The facility shall request modification of its permit to install a new coating within 180 days.
6. The Permittee shall inspect the areas where tank trucks are unloading after each use. Any release of waste observed during these inspections must be responded to immediately. Such response shall include containing and collecting the released material and removing all contaminated material.
7. The Permittee shall cover the manhole located in the driveway with a polypropylene cover before loading/unloading of special waste.
8. Loading/unloading of special waste may be conducted at the new loading dock on the east side of the warehouse in accordance with Modification Log No. B-113R-M-3. The absorbent socks must be in place and completely surrounding the trailers before any waste is loaded or unloaded. This loading dock may only be used during the implementation of Detrex's corrective measures plan. Closure of the new loading/unloading dock must be completed within 60 days of the issuance of the no further action approval letter for the original loading/unloading dock area.

SECTION VII  
AIR EMISSION STANDARDS FOR CONTAINERS

- A. Whenever hazardous waste is in a container using Container Level 1 or 2 controls, the permittee shall install all covers and closure devices for the container and secure and maintain each closure device in closed position except:
1. Opening of a closure device or cover for a container is allowed for the purposes of adding/removing hazardous waste or material as follows:
    - a. In the case where the container is filled to the intended final level in one continuous operation, the permittee shall promptly secure the closure devices in the closed position and install the covers upon conclusion of the filling operation.
    - b. In the case where discrete quantities or batches of material intermittently are added to the container over a period of time, the permittee shall promptly secure the closure devices in the closed position and install covers upon either the container being filled to the intended final level; the completion of a batch loading after which no additional material will be added to the container within 15 minutes; the person performing the loading operation leaving the immediate vicinity of the container; or the shutdown of the process generating the material being added to the container, whichever condition occurs first.
    - c. An empty container, as defined in 35 Ill. Adm. Code 721.107(b), may be open to the atmosphere at any time.
    - d. In the case when discrete quantities or batches of material are removed from the container but the container does not meet the conditions to be an empty container as defined in 35 Ill. Adm. Code 721.107(b), the permittee shall promptly secure the closure devices in the closed position and install covers upon the completion of a batch removal after which no additional material will be removed from the container within 15 minutes or the person performing the unloading operation leaves the immediate vicinity of the container, whichever condition occurs first.
  2. Opening of a closure device or cover is allowed when access inside the container is needed to perform routine activities other than transfer of hazardous waste.

3. Opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device which vents to the atmosphere is allowed during normal operations for the purpose of maintaining the internal pressure of the container in accordance with the container design specifications.
  4. Opening of a safety device is allowed at any time conditions require doing so to avoid an unsafe condition.
- B. The permittee shall inspect the containers and their covers and closure devices as follows:
1. In the case when a hazardous waste already is in the container at the time the permittee first accepts possession of the container at the facility and the container is not emptied within 24 hours after the container is accepted at the facility, the permittee shall visually inspect the container and its cover and closure devices to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position. The container visual inspection must be conducted on or before the date on which the container is accepted at the facility.
  2. In the case when a container used for managing hazardous waste remains at the facility for a period of one year or more, the permittee shall visually inspect the container and its cover and closure device initially and thereafter, at least once every 12 months, to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position.
  3. When a defect is detected for the container, cover, or closure devices, the permittee shall make first efforts at repair of the defect no later than 24 hours after detection and repair must be completed as soon as possible but no later than five calendar days after detection. If repair cannot be completed within five calendar days, then the hazardous waste must be removed from the container and the container must not be used to manage hazardous waste until the defect is repaired.

ATTACHMENT A  
WASTE LISTS AND HAZARDOUS WASTE  
IDENTIFICATION NUMBERS

ILD074424938

LPC #0311860003

Part B Log #113



ATTACHMENT A

All wastes accepted at the Facility are halogenated organic hazardous wastes under 35 Ill. Adm. Code 721 classified as F001 or F002 and the corresponding U codes for those materials. The wastes may also be dually classified as D-series wastes with respect to TCLP parameters.

EPA HAZARDOUS WASTE NO.

HAZARDOUS WASTE

F001

The following spent halogenated solvents used in degreasing tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane and trichlorotrifluoroethane; all spent solvent mixtures and blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004 or F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.

F002

The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, and 1,1,2-trichloro-1,2,2-trifluoroethane; all spent solvent mixtures and blends containing before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F001, F004, or F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.

U080

dichloromethane

U121

trichloromonofluoromethane

U210

tetrachloroethylene

U226

1,1,1-trichloroethane

U228

trichloroethene

D039

D040

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tetrachloroethylene

trichloroethylene

ATTACHMENT A

The waste codes listed below represent potential underlying constituents and are not accepted without primary waste codes.

EPA HAZARDOUS WASTE NO.

HAZARDOUS WASTE  
BASED ON TOXICITY  
CHARACTERISTICS

D004	Arsenic
D005	Barium
D018	Benzene
D006	Cadmium
D019	Carbon Tetrachloride
D021	Chlorobenzene
D007	Chromium
D027	1,4-Dichlorobenzene
D028	1,2-Dichloroethane
D029	1,1-Dichloroethylene
D030	2,4-Dinitrotoluene
D034	Hexachloroethane
D008	Lead
D009	Mercury
D035	Methyl ethyl ketone
D010	Selenium
D011	Silver
D038	Pyridine

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ATTACHMENT B  
CLOSURE CERTIFICATION FORMS

ILD074424938

LPC #0311860003

Part B Log #113R

ATTACHMENT B

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

The hazardous waste management unit at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
USEPA ID Number

\_\_\_\_\_  
Facility Name

\_\_\_\_\_  
Signature of Owner/Operator

\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Signature of Registered P.E.

\_\_\_\_\_  
Name of Registered P.E. and  
Illinois Registration Number

\_\_\_\_\_  
Date

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ATTACHMENT C  
INSPECTION SCHEDULE

ILD074424938

LPC #0311860003

Part B Log #113R

TABLE I: INSPECTION SCHEDULE  
FOR HAZARDOUS WASTE STORAGE AREA

<u>Inspection Item</u>	<u>Frequency</u>	<u>Procedure</u>
1. Check container placement, stacking, aisle space and segregation	Daily	Visual
2. Check containers for adequate seals, open lids, and loose bungs	Daily	Visual
3. Check container labels	Daily	Visual
4. Check containers for corrosion, leaks, deformation	Daily	Visual
5. Check pallets for damage	Daily	Visual
6. Check the concrete floor for cracks, deterioration, wet spots	Weekly	Visual
7. Check the concrete ramps and curbs for settlement, cracks, wet spots	Weekly	Visual
8. Check the containment system for spills, leaks, stains	Weekly	Visual
9. Check the locks on gates and doors	Daily	Visual/Physical

<u>Inspection Item</u>	<u>Frequency</u>	<u>Procedure</u>
10. Check the warning signs	Weekly	Visual
11. Check the loading/ unloading area for obstructions, spills, leaks, stains	Daily (When in use)	Visual

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USEPA



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

March 20, 2000

CERTIFIED MAIL  
P 344 306 038

Detrex Corporation  
Attn: Mr. David Craig  
P.O. Box 5111  
Southfield, MI 48086-5111

Re: 03118660003 -- Cook County  
Detrex Corporation  
ILD 074424938  
Log No. B-113-M-10  
RCRA Permit File

Dear Mr. Craig:

This letter is in response to your submittal dated February 9, 2000, requesting a Class 1 modification. The Illinois EPA has approved your Class 1 modification request to update the Emergency Response Agencies/Organizations listing found in Table G-2 of your Contingency Plan.

The Illinois EPA has reviewed the information contained in your submittal and has determined that Detrex may implement this modification. This determination is based upon our review of (1) the RCRA Part B Permit issued to Detrex, (2) the regulations [35 Ill. Adm. Code Subtitle G] and (3) the information contained in your submittal. Operations must be conducted in accordance with the approved Part B Permit originally issued to Detrex and all subsequent modifications to the Part B Permit. Only the Illinois EPA portion of the permit has been modified. Since this modification did not result in any changes to the language of the Permit, only the cover page reflecting the approval of this modification is being sent to you. This letter and the enclosed Part B cover page should be attached to the front of your Part B Permit.

The permittee must complete the public notice requirements for the Class 1 modification as requested in Log # 113-M-10. Pursuant to 35 Ill. Adm. Code 703.281(a)(2), a notice of the modification shall be sent to all persons on the facility mailing list, maintained by Illinois EPA in accordance with 35 Ill. Adm. Code 705.163(a)(4), and the appropriate units of the state and local government, as specified in 35 Ill. Adm. Code 705.163(a)(5). This notification must be made within ninety (90) days of the date of issuance of this letter.

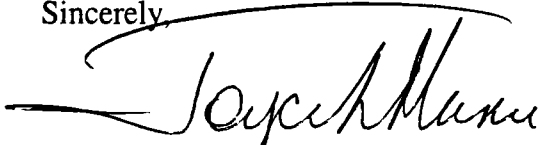
GEORGE H. RYAN, GOVERNOR

Page 2

Within 35 days after the notification of a final permit decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

If you have any additional questions in this matter, please contact Mary Riegle at 217/524-3329.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joyce L. Munie".

Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

<sup>TJD</sup>  
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cc: Harriet Croke, USEPA



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

### ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

#### HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

Operator

Detrex Corporation  
Attn: Mr. Daniel Anderson  
Branch Manager  
2537 LeMoyne Avenue  
Melrose Park, Illinois 60160

Owner

Clauss Industrial District  
Attn: Mr. Richard R. Lareno  
Managing Agent  
21150 Prestwick Drive  
Barrington, Illinois 60010

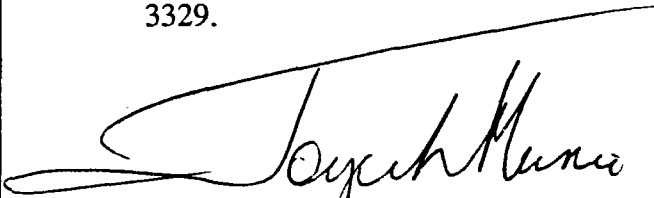
Illinois EPA #0311860003 -- Cook County  
USEPA ILD074424938  
Detrex Corporation, Melrose Park Facility  
RCRA Permit No. 113  
Modification Log No. 113-M-10  
RCRA -- Part B

Issue Date: September 30, 1992  
Effective Date: November 4, 1992  
Expiration Date: November 4, 2002  
Modification Date: March 20, 2000

A RCRA Part B Permit is hereby granted pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (I.A.C.) Parts 702, 703, 705, and 720 through 729 to the Detrex Corporation Melrose Park facility to construct/maintain and operate a waste management facility involved in the storage of hazardous waste. Detrex Corporation is located at 2537 LeMoyne Avenue, Melrose Park, Illinois.

This permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and Title 35 I.A.C. Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 ½, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which is issued. This Permit contains 75 pages including Attachments A through F.

If you have any questions regarding this Part B Permit, please contact Mary Riegle at 217/524-3329.

  
Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

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GEORGE H. RYAN, GOVERNOR



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

February 18, 2000

CERTIFIED MAIL  
P 344 306 014

Detrex Corporation  
Attn: Mr. David Craig  
P.O. Box 5111  
Southfield, MI 48086-5111

Re: 0311860003 -- Cook County  
Detrex Corporation  
ILD074424938  
Log No. B-113-M-9  
RCRA Permit File

Dear Mr. Craig:

This letter is in response to your submittal dated December 13, 1999, requesting a Class 1\* modification. The Illinois EPA has approved your Class 1\* modification request to update personnel on the Emergency Coordinator listing and to update the Emergency Response Agencies/Organizations listing found in Tables G-1 and G-2 respectively of your Contingency Plan.

The Illinois EPA has reviewed the information contained in your submittal and has determined that Detrex may implement this modification. This determination is based upon our review of (1) the RCRA Part B Permit issued to Detrex, (2) the regulations [35 Ill. Adm. Code Subtitle G] and (3) the information contained in your submittal. Operations must be conducted in accordance with the approved Part B Permit originally issued to Detrex and all subsequent modifications to the Part B Permit. Only the Illinois EPA portion of the permit has been modified. Since this modification did not result in any changes to the language of the Permit, only the cover page reflecting the approval of this modification is being sent to you. This letter and the enclosed Part B cover page should be attached to the front of your Part B Permit.

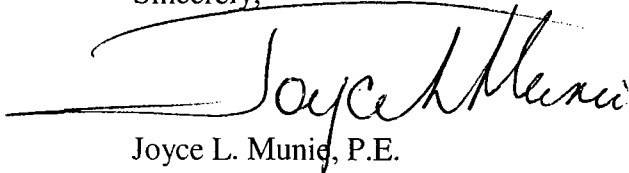
The permittee must complete the public notice requirements for the Class 1 modification as requested in Log # 113-M-9. Pursuant to 35 Ill. Adm. Code 703.281(a)(2), a notice of the modification shall be sent to all persons on the facility mailing list, maintained by Illinois EPA in accordance with 35 Ill. Adm. Code 705.163(a)(4), and the appropriate units of the state and local government, as specified in 35 Ill. Adm. Code 705.163(a)(5). This notification must be made within ninety (90) days of the date of issuance of this letter.

Page 2

Within 35 days after the notification of a final permit decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

If you have any additional questions in this matter, please contact Mary Riegle at 217/524-3329.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joyce L. Munie". The signature is written in dark ink and is positioned above the typed name.

Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

JLM:MER:bjh\3311S.WPD

cc: Harriet Croke, USEPA



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

### HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

Operator

Detrex Corporation  
Attn: Mr. Daniel Anderson  
Branch Manager  
2537 LeMoyne Avenue  
Melrose Park, Illinois 60160

Owner

Clauss Industrial District  
Attn: Mr. Richard R. Lareno  
Managing Agent  
21150 Prestwick Drive  
Barrington, Illinois 60010

Illinois EPA #0311860003 -- Cook County  
USEPA ILD074424938  
Detrex Corporation, Melrose Park Facility  
RCRA Permit No. 113  
Modification Log No. 113-M-9  
RCRA -- Part B

Issue Date: September 30, 1992  
Effective Date: November 4, 1992  
Expiration Date: November 4, 2002  
Modification Date: February 18, 2000

A RCRA Part B Permit is hereby granted pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (I.A.C.) Parts 702, 703, 705, and 720 through 729 to the Detrex Corporation Melrose Park facility to construct/maintain and operate a waste management facility involved in the storage of hazardous waste. Detrex Corporation is located at 2537 LeMoyne Avenue, Melrose Park, Illinois.

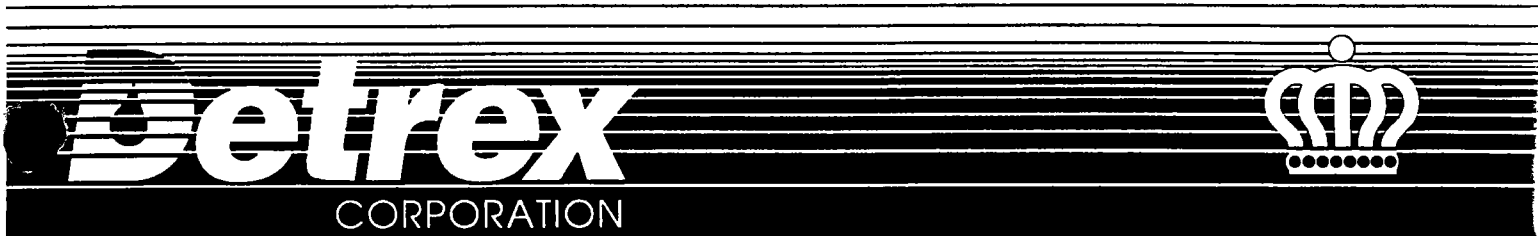
This permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and Title 35 I.A.C. Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 ½, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which is issued. This Permit contains 75 pages including Attachments A through F.

If you have any questions regarding this Part B Permit, please contact Mary Riegle at 217/524-3329.

Joyce L. Munie, P.E.  
Manager, Permit Section  
Bureau of Land

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GEORGE H. RYAN, GOVERNOR



PO BOX 5111 • SOUTHFIELD MI 48086-5111 • (248) 358-5800 • FAX (248) 358-5803

January 19, 1999

George Hamper, USEPA Region V  
RCRA Permitting Branch  
77 West Jackson Blvd.  
Chicago, IL 60604

RE: Class 1 Permit Modification  
Detrex Corporation  
Melrose Park, IL  
EPA ID #: ILD-074 424 938

Dear Mr. Hamper:

Pursuant to 35 Ill. Adm. Code 703.281(a)(2) Detrex Corporation is providing notification to all individuals on the mailing list of changes to the list of emergency response agencies in our Contingency Plan. These changes were made to insure adequate response in the event of an emergency.

If you should have any further questions regarding the closure cost reduction please feel free to give me a call.

Sincerely,

David Craig, CHMM, CET  
Manager of Environmental and Safety Compliance

CC: File  
Facility



**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY**  
1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276

Mary A. Gamm

**CERTIFIED MAIL**  
P 344 292 299

217/524-3300

January, 4 1999

Mr. David Craig, CHMM, CET  
Manager of Environmental and Safety Compliance  
P.O. Box 5111  
Southfield, Michigan 48086-5111

Re: 0311866003 -- Cook County  
Detrex Corporation Melrose Park Facility  
ILD074424938  
RCRA Part B Log #113-M-8  
RCRA Part B Permit File

Dear Mr. Craig:

This letter is in response to your Class 1 Modification request dated November 18, 1998, to modify your contingency plan. Your application is included in the Illinois Environmental Protection Agency's ("Illinois EPA") records as Part B Log #113-M-8.

The Illinois EPA approves the changes to the phone numbers in Table G-2, Emergency Response Agencies/Organizations. The Illinois EPA also approves the removal of Melrose Park Environmental Control Board from Table G-2. This determination is based upon a review of (1) the RCRA permit issued to Detrex Corporation Melrose Park Facility, (2) the regulations (35 Ill. Adm. Code Subtitle G), and (3) the information contained in your submittal.

Pursuant to 35 Ill. Adm. Code 703.281(a)(2), a notice of the modification shall be sent to all persons on the facility mailing list, maintained by the Illinois EPA in accordance with 35 Ill. Adm. Code 705.163(a)(4), and the appropriate units of the state and local government, as specified in 35 Ill. Adm. Code 705.163(j)(5). This notification must be made within 90 calendar days after the change is put into effect. Because the above changes do not require a revision in the language of Part B Permit, only the revised signature page is attached. Operations must be conducted in accordance with the approved RCRA Part B Permit issued to Detrex Corporation Melrose Park Facility and all subsequent modifications to the Part B Permit.

Work required by this permit, your application or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This permit does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of laws must be performed in compliance with them. The Illinois EPA may refer any discovery of these laws to the appropriate regulating authority.

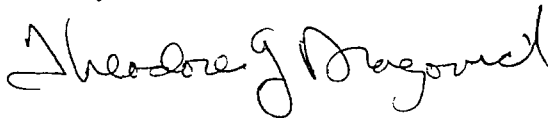


Page 2

Within 35 after the notification of the final permit decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

If you have any additional questions in this matter, please contact Trupti Dongre of my staff at 217/557-3200.

Sincerely,



Theodore J. Dragovich, P.E.  
Manager, Hazardous Waste Branch  
Permit Section  
Bureau of Land

TJD:TVD:bjh\982691S.WPD

cc: USEPA, Hak Cho



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276

Mary A. Gade, Director

## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

### HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

Operator

Detrex Corporation  
Attn: Mr. Daniel Anderson  
Branch Manager  
2537 LeMoyne Avenue  
Melrose Park, Illinois 60160

Owner

Clauss Industrial District  
Attn: Mr. Richard R. Lareno  
Managing Agent  
21150 Prestwick Drive  
Barrington, Illinois 60010

Illinois EPA #0311860003 -- Cook County  
USEPA ILD074424938  
Detrex Corporation, Melrose Park Facility  
RCRA Permit No. 113  
Modification Log No. 113-M-8  
RCRA -- Part B

Issue Date: September 30, 1992  
Effective Date: November 4, 1992  
Expiration Date: November 4, 2002  
Modification Date: January 4, 1999

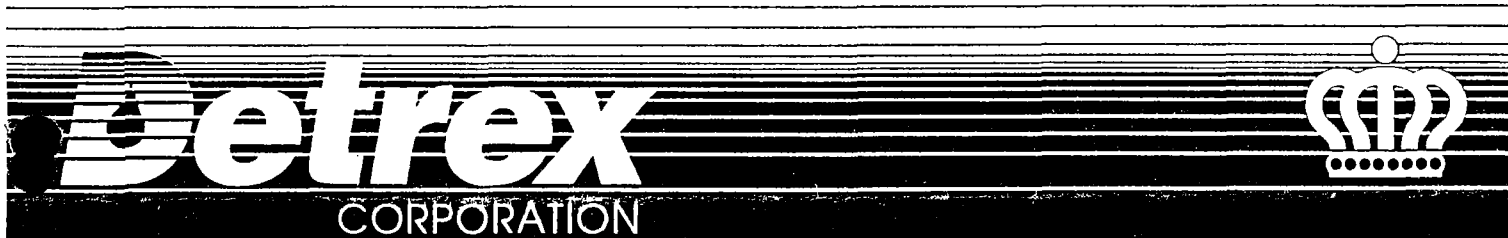
A RCRA Part B Permit is hereby granted pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (I.A.C.) Parts 702, 703, 705, and 720 through 729 to the Detrex Corporation Melrose Park facility to construct/maintain and operate a waste management facility involved in the storage of hazardous waste. Detrex Corporation is located at 2537 LeMoyne Avenue, Melrose Park, Illinois.

This permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and Title 35 I.A.C. Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 ½, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which is issued. This Permit contains 75 pages including Attachments A through F.

If you have any questions regarding this Part B Permit, please contact Trupti Dongre at 217/557-3200.

Theodore J. Dragovich, P.E.  
Manager, Hazardous Waste Branch  
Permit Section  
Bureau of Land

TJD:TVD:bjh\982691S.WPD



P.O. BOX 5111 • SOUTHFIELD, MI 48086-5111 • (248) 358-5800 • FAX (248) 358-5803

April 22, 1998

*HAK CHO D-8J*  
~~George Hamper~~

USEPA Region V  
RCRA Permitting Branch  
77 West Jackson Blvd.  
Chicago, IL 60604

RE: Class 1 Permit Modification  
Detrex Corporation  
Melrose Park, IL  
EPA ID #: ILD 074 424 938

Dear Mr. Hamper:

This letter is being sent to you as required under 40 CFR § 270.42(a)(i) to inform you that Detrex Corporation has received approval from ILEPA to reduce the closure cost associated with the operations at our Melrose Park Facility. These reductions are due to a reduction in disposal costs.

If you should have any further questions regarding the closure cost reduction please feel free to give me a call.

Sincerely,

David Craig, CHMM, CET  
Manager of Environmental and Safety Compliance

CC: File  
Facility



FILE  
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276

Mary A. Gade, Director

217/524-3300

CERTIFIED MAIL

P 344 351 005

April 15, 1998

Detrex Corporation  
David Craig, CHHM, CET  
Manager of Environmental and Safety Compliance  
P.O. Box 5111  
Southfield, MI 48086-5111

Re: 0311860003 -- Cook County  
Detrex Corporation (Melrose Park facility)  
→ ILD074424938  
Log No. B-113-M-7  
RCRA Permit File

RECEIVED  
APR 28 1998  
DIVISION FRONT OFFICE  
Waste, Pesticides & Toxics Division  
U.S. EPA - REGION 5

Dear Mr. Craig:

This letter is written in response to your January 12, 1998 request to modify the closure cost estimate for the above facility. Your request is hereby approved as Class 1\* modification with prior approval of the Illinois EPA. This determination is based upon a review of (1) the RCRA permit issued to Detrex, (2) the regulations 35 Ill. Adm. Code 703 appendix A(D)(1)(a), and (3) the information contained in your submittal. Pursuant to 35 Ill. Adm. Code 703.281(a)(2), a notice of the modification shall be sent to all persons on the facility mailing list, maintained by Illinois EPA per 35 Ill. Adm. Code 705.165(a)(4), and the appropriate units of the state and local government, as specified in 35 Ill. Adm. Code 705.163(a)(5). This notification must be made within ninety (90) days of the date of issuance of this letter. Only the revised Illinois EPA permit is enclosed, since no modifications of the USEPA portion of the permit were made. A summary of the revisions to the Part B Permit is included as Attachment F in the revised permit.

The Illinois EPA has reviewed the information contained in your submittal and modified your permit accordingly. The Illinois EPA has added Attachment F to your permit to identify the approved closure cost estimate.

Within 35 days after notification of a final permit decision, the permittee may petition the Illinois Pollution Control Board to contest the issuance of the permit. The petition shall include a statement of the reasons supporting a review, including a demonstration that any issues raised in the petition, were previously raised during the public comment period. In all other respects, the petition shall be in accordance with the requirements for permit appeals as set forth in 35 Ill. Adm. Code Part 105. Nothing in this paragraph is intended to restrict appeal rights under Section 40(b) of the Environmental Protection Act (35 Ill. Adm. Code 705.212(a)). Issues concerning the USEPA portion of the permit should be directed to USEPA--Region V.

Page 2

If you have any questions in this matter, please contact Shashi Goel of my staff at 217/524-3266.  
If you intend to seek review of USEPA issued permit, please contact USEPA-Region V Juana Rojo at 312/886-0990 concerning the applicable review procedures.

Sincerely,



Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Bureau of Land

ECB:SPG:<sup>TSO</sup>bjh\982691S.WPD

Attachment: Revised Permit

cc: USEPA Region V--Kelly Moore



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 Mary A. Gade, Director

## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

### HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

Operator

Detrex Corporation  
Attn: Mr. Daniel Anderson  
Branch Manager  
2537 LeMoyne Avenue  
Melrose Park, Illinois 60160

Owner

Clauss Industrial District  
Attn: Mr. Richard R. Lareno  
Managing Agent  
21150 Prestwick Drive  
Barrington, Illinois 60010

Illinois EPA #0311860003 -- Cook County  
USEPA ILD074424938  
Detrex Corporation, Melrose Park Facility  
RCRA Permit No. 113  
Modification Log No. 113-M-7  
RCRA -- Part B

Issue Date: September 30, 1992  
Effective Date: November 4, 1992  
Expiration Date: November 4, 2002  
Modification Date: April 15, 1998

A RCRA Part B Permit is hereby granted pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (I.A.C.) Parts 702, 703, 705, and 720 through 729 to the Detrex Corporation Melrose Park facility to construct/maintain and operate a waste management facility involved in the storage of hazardous waste. Detrex Corporation is located at 2537 LeMoyne Avenue, Melrose Park, Illinois.

This permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and Title 35 I.A.C. Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 ½, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which is issued. This Permit contains 75 pages including Attachments A through F.

If you have any questions regarding this Part B Permit, please contact Shashi Goel at 217/524-3266.

A handwritten signature in black ink, appearing to read "Edwin C. Bakowski".

Edwin C. Bakowski, P.E.  
Manager, Permit Section  
Bureau of Land

ECB:SPG:bjh\982691S.WPD

HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

DETREX CORPORATION (Operator)

And

CLAUSS INDUSTRIAL DISTRICT (Owner)

Melrose Park, Illinois

LPC No. 0311860003 -- Cook County

ILD074424938

Permit Log No. 113

April, 1998  
LPC #0311860003  
Part B Log No. 113

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April, 1998  
LPC #0311860003  
Part B Log No. 113

LIST OF ATTACHMENTS

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## SECTION I CONTAINERS

### A. SUMMARY

Containers of hazardous waste shall be stored in the hazardous waste storage area. The hazardous waste storage area is located indoors, in the northern half of the facility site. The hazardous waste storage area consists of a diked concrete base. The concrete shall be coated with a chemical resistant sealant. The hazardous waste storage area shall have a containment capacity of at least 8,221 gallons. This containment capacity is adequate to contain at least 10 percent of the volume of the hazardous waste and product containers to be stored within the secondary containment system. The maximum volume of hazardous waste to be stored in the hazardous waste storage area shall be 27,500 gallons, corresponding to a maximum of 500 55-gallon drums. A maximum of 300 55-gallon product and/or empty containers may also be stored within the secondary containment area. The only waste which may be stored in the hazardous waste storage area are hazardous wastes as identified in Table C-1 of the approved permit application.

### B. WASTE IDENTIFICATION

1. The storage of all hazardous waste containers shall be performed in the approved storage area shown as the hazardous waste container storage area on Attachment D-1 of the approved permit application.
2. The Permittee may only store the hazardous wastes identified in Table C-1 of the approved permit application in the container storage area. A maximum of 27,500 gallons of waste may be stored in the container storage area. The hazardous waste codes for those wastes are listed in Attachment A to this permit.
3. The Permittee is prohibited from storing waste (hazardous or non-hazardous) in the secondary containment area that is not identified in Condition B. 2. above.
4. Prior to the shipment of any drummed waste to Detrex from a new customer, a preliminary assessment of the waste shall be conducted at the generator's facility. This preliminary assessment shall include analysis of a waste sample for specific gravity, ignitability and a visual inspection of a full depth sample, using a coliwasa, to determine color and phases. This sampling shall be conducted by Detrex's personnel, unless the generator has conducted this analysis within the last year, the drum sealed

and all results recorded in Detrex's operating record. A representative sample, obtained by Detrex personnel, shall then be sent to the laboratory and analyzed for specific gravity, ignitability, organics and total metals unless the generator has conducted an analysis, which includes specific gravity, ignitability, organics and total metals of the waste stream within the last two years. The results of all laboratory analyses shall be recorded in Detrex's operating record and must also indicate who obtained the sample, the date of the sampling, and the sampling procedures used.

5. Detrex shall only accept wastes with a specific gravity greater than or equal to 0.80 and less than or equal to 1.68.
6. Prior to storing containers of waste in the hazardous waste container storage area, all containers shall be visually inspected and analyzed for specific gravity and the results compared to the one recorded during the preliminary assessment. In addition, all containers listed on a line item of a manifest shall be composited and analyzed for flammability (ASTM Method D4982-89). If the composite sample is flammable or even slightly flammable, all the drums within that composite shall be analyzed for flammability. Any drum that is flammable or even slightly flammable shall be analyzed for ignitability and the results compared to the one recorded during the preliminary assessment. If a discrepancy is found, the waste shall not be accepted at the facility prior to reanalysis. If the specific gravity, ignitability, and visual inspection is consistent with previous analysis, the containers may be stored at the facility.
7. Analysis for organics shall include all of the hazardous constituents for the volatile organics identified in Table C-1 of the approved permit application and Attachment A to this permit.
8. Samples which will be tested for volatile organics shall not be composited because of the volatilization which may result from any compositing method.
9. Every five (5) years a sample from each waste stream from each customer shall be sent off-site to the laboratory for analysis of specific gravity, organics, ignitability, and total metals, unless the process generating the waste changes prior to that time. If the process generating the waste changes, the waste shall not be accepted at the facility prior to reanalysis.
  - a. For existing customers on the effective date of this permit, the first such analysis shall be conducted as follows:

1. If the generator or Detrex has conducted such an analysis within the last two (2) years prior to the effective date of this permit, then the next analysis shall be conducted not later than five (5) years from the date of such analysis.
  2. If the generator or Detrex has not conducted such an analysis as set forth above, and Detrex is storing the waste stream from the generator on the effective date of this permit, then such analysis shall be conducted within twelve (12) months from the effective date of this permit.
  3. If the generator or Detrex has not conducted such an analysis as set forth in Condition I.B.9.a.1 above and Detrex is not storing the waste stream from the customer on the effective date of this permit, then such analysis shall be conducted within twelve (12) months from the date of receipt of the first delivery of the waste stream from the generator following the effective date of this permit.
- b. For new customers obtained after the effective date of this permit, such analysis shall be conducted within five (5) years after the preliminary assessment or within five (5) years of the analysis conducted by the generator, whichever is earlier.
10. Analysis for ignitability shall be conducted in accordance with ASTM D-93 or ASTM D-3228 (35 IAC Section 721.121 (a)(1)). Analysis for flammability shall be conducted in accordance with ASTM D4982-89.
  11. A coliwasa sampler shall be used to obtain a representative sample from each drum.
  12. A maximum of 300 55-gallon product and empty containers may be maintained within the secondary containment system. The containers shall only contain the hazardous constituents permitted for storage in the hazardous waste storage area and shall not contain materials that are incompatible with any waste or other materials stored nearby in other containers unless separated from the other material and protected from them by means of a dike, berm, wall, or other devices. In addition, containers of ignitable and combustible (NFPA definition) product shall not be stored in the secondary containment area.
  13. The frequency of duplicate, blank, and spiked samples shall be consistent with the latest edition of SW-846.

- C. CONDITION OF CONTAINERS -- If a container holding hazardous waste or product which is being stored in the hazardous waste secondary containment system is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee must transfer the hazardous waste or product from this container to a container that is in good condition or manage the waste in accordance with the approved permit application.
- D. COMPATIBILITY OF WASTE WITH CONTAINERS -- The Permittee must use a container made of or lined with material which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.
- E. MANAGEMENT OF CONTAINERS -- The Permittee shall comply with the following management practices:
1. A container holding hazardous waste or product which is being stored in the hazardous waste secondary containment system must always be closed during storage, except when it is necessary to add or remove waste.
  2. A container holding hazardous waste or product which is being stored in the hazardous waste secondary containment system must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.
- F. INSPECTION
- The Permittee shall inspect the container area weekly, in accordance with the inspection schedule, specified in Attachment D, to detect leaks and deterioration of containers and the containment system caused by corrosion or other factors. The containment system shall be repaired or recoated as soon as possible, if the inspection determines the concrete sealant has deteriorated. Detrex shall perform a complete inspection of the concrete sealant yearly and perform annual maintenance to insure the integrity of the lining.
- G. CONTAINMENT -- The Permittee shall construct, operate, and maintain the containment system according to the design plans and operating specifications contained in the approved permit application.
- H. CLOSURE -- At closure, at a minimum, all hazardous waste and hazardous waste residues and constituents must be removed from the containment system. Remaining wastes, liners, bases, soil and groundwater containing or contaminated with hazardous waste, hazardous waste residue or hazardous constituents must be decontaminated or removed. Closure of the

container storage area shall be carried out in accordance with the closure plan in the approved permit application, as modified below:

1. The Permittee shall notify Illinois EPA's DLPC in writing of its intent to close the container storage area at least 180 days prior to the date closure is expected to begin. Along with this notification, the Permittee shall submit a sampling and analysis plan to be used in demonstrating the storage area has been properly decontaminated. This plan must be approved by Illinois EPA's DLPC in writing prior to being implemented. Illinois EPA review of this plan will be subject to the permit appeal provisions contained in Sections 39(a) and 40(a) of the Illinois Environmental Protection Act. The response from Illinois EPA will approve and establish:
  - a. The sampling and decontamination plan;
  - b. What contaminants must be analyzed for;
  - c. Analytical requirements (SW-846 Methods should be utilized); and
  - d. The level at which decontamination or removal is considered complete.
2. All sweepings, wash water and rinsate generated during the closure of the unit shall be managed as a hazardous waste, unless it can be shown to be exempt under 35 IAC Part 721.
3. The Permittee shall provide post-closure care in accordance with 35 IAC Part 724 for the container storage area if all of the hazardous wastes or contaminated material or media cannot be practicably removed or decontaminated in accordance with the closure requirements outlined in the permit and in the approved closure plan. If it is determined that the closure requirements cannot be met and post-closure care is required, this Permit must be modified to require post-closure care in accordance with 35 IAC, Subtitle G, Part 724, Subparts G and H.
4. Should post-closure care, as described above, become necessary, the Permittee shall submit an application for modification to this permit, including an amended closure and post-closure care plan for this unit, within thirty (30) days following discovery that clean closure cannot be accomplished. If a determination is made to not pursue clean closure prior to the implementation of the closure plan, the modification request shall be made no later than sixty (60) days after the determination is made.

5. Financial assurance for closure and post-closure of the container storage area, if required, shall be provided within thirty (30) days following modification of the permit.
6. Within sixty (60) days after closure of the container storage area is complete, the Permittee shall submit certification to Illinois EPA that the unit has been closed in accordance with the approved closure plan.

The closure certification forms in Attachment C to this permit or a certification with identical wording must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer (registered in the State of Illinois) should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the area(s) until Illinois EPA approves the closure certification for the unit. Illinois EPA's review of closure certification for partial or final closure will be conducted in accordance with 35 IAC 724.243.

A Closure Documentation Report is to be submitted with the closure certification which includes the following items, if applicable:

- a. The volume of waste and waste residue removed, including wastes resulting from decontamination activities.
- b. A description of the method of waste handling and transport.
- c. Copies of the waste manifests.
- d. A description of the sampling and analytical methods used including sample preservation methods and chain-of-custody information.
- e. A chronological summary of closure activities and the cost involved.
- f. Tests performed, methods and results.
- g. Color photographs of closure activities which document conditions before, during and after closure.
- h. A scale drawing of all excavated or decontaminated areas and sample locations.

7. To avoid creating another regulated storage unit during closure, it is recommended that you obtain any necessary permits for waste disposal prior to initiating excavation activities. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The ninety (90) day accumulation time exemption (35 IAC 722.134) only applies to containers and tanks.
8. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.
9. If Illinois EPA determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 724.211, Illinois EPA reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
10. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store on-site generated hazardous waste in containers or tanks pursuant to 35 IAC 722.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).

I. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials in the same container.

Incompatible wastes or materials must not be placed in the same container to prevent reactions which:



- a. Generate extreme heat or pressure, fire or explosions, or violent reactions
- b. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment
- c. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions
- d. Damage the structural integrity of the device or facility
- e. Through other like means, threaten human health or the environment.

The basic methods for preventing such reactions are to:

- a. Treat one or both of the incompatible wastes/materials to render them compatible prior to placing them in the container
  - b. Physically separate the incompatible wastes/materials in the containers so that it is not possible for the incompatible wastes/materials to come in contact with each other.
2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.
  3. The Permittee shall not store containers holding a hazardous waste or product that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments unless separated from the other material or protected from them by means of a dike, berm, wall, or other devices.

J. GENERAL CONSTRUCTION REQUIREMENTS

The container storage area may only be constructed in accordance with the approved permit application and the specifications for the sealant, approved by Illinois EPA on April 28, 1992, subject to the following modifications:

1. Within thirty days after completing the installation of the sealant and prior to any container of waste being placed or stored in the container storage area, the Permittee shall submit to Illinois EPA a certification from a qualified, registered professional engineer, demonstrating that the container storage area meets the requirements of 35

IAC 724.275(b). This certification document shall contain the information required in Attachment B and a statement that the base is free of cracks or gaps.

2. The Permittee may not store wastes until the construction certification is approved. Illinois EPA shall review the certification described above to ensure the container storage area and its secondary containment meets the requirements of 35 IAC 724.292 and 724.293. Illinois EPA will respond with any comments to this certification in writing within forty-five days from the receipt of this certification. If Illinois EPA does not respond within forty-five days from the receipt of this certification, the permittee may consider the certification approved. Illinois EPA review of this certification will be subject to the appeal provisions contained in Section 39(a) and 40(a) of the Illinois Environmental Protection Act.

K. CONTINGENCY PLAN - ADDITIONAL SPECIAL CONDITIONS

1. The Permittee shall implement the facility contingency plan contained in the approved permit application any time there is (1) a release of hazardous waste or hazardous constituents which could threaten human health or the environment, (2) a release of hazardous waste or hazardous constituents which is equal to or greater than the Reportable Quantity (RQ) listed in Table G-3 of the permit application, (3) a fire or explosion which involves hazardous waste or which occurs in areas where hazardous wastes are stored, or (4) a release of hazardous waste or hazardous waste constituents which, based on the air dispersion modeling results contained in the contingency plan, would be expected to result in exposure above an OSHA short term exposure limit to unprotected persons. (This would not apply to responding personnel who employ the proper personal protective equipment (PPE)).
2. The Permittee shall contact the local emergency response entities as soon as possible after implementation of the contingency plan:
  - a. The entities which must be notified include:
    1. Melrose Park Fire Department
    2. Melrose Park Police Department
    3. Local ESDA Coordinator

- b. The information which must be initially relayed to each entity includes:
    - 1. The type of emergency (release, fire or explosion);
    - 2. The type of wastes or product involved in the emergency and the approximate quantity involved;
    - 3. An initial assessment of the conditions at the site;
  - c. If the Permittee is able to properly respond to the emergency without any aid from the entities identified in Condition 2.a above, the Permittee shall notify each of these entities that the emergency situation no longer exists once all required emergency response and cleanup activities have been completed. This condition does not preclude the need to initially notify the entities in 2.a above.
3. Within 60 days of the effective date of this permit, the Permittee shall demonstrate to Illinois EPA that the following information has been provided to the local fire department, the local police department and all other agencies identified in 35 IAC 724.153(b) (Note that this information must be provided to these entities to ensure the requirements of 35 IAC 724.137 are met):
- a. A list of all hazardous wastes to be managed at the facility (generic name), including the EPA hazardous waste number;
  - b. A scaled drawing showing the location of all hazardous waste management units at the facility and all other areas where hazardous waste is handled at the facility (such as loading/unloading areas, etc.). This scaled drawing must also identify the entrances to the facility, roads within the facility and possible evacuation routes;
  - c. A description of the types of hazardous waste and products managed at each hazardous waste management unit at the facility;
  - d. A description of the procedures used to handle hazardous waste at the facility;
  - e. An estimate of the quantity of the various types of hazardous wastes which may be present at the facility. An estimate of the typical inventory of hazardous wastes at the facility must also be included;

- f. The following information regarding the properties of the hazardous wastes managed at the facility and the products to be stored in the hazardous waste secondary containment system:

Name  
USEPA Hazardous Waste No.  
IDLH  
TLVs (TLV-TWA, TLV-STEL, TLV-C)  
Vapor Pressure at 68 F (20 C)  
NFPA Designation (flammable or combustible)  
Material Safety Data Sheets  
Other appropriate characteristics (such as  
reactive class, etc.) USDOT classification.

- g. An identification of the products of incomplete combustion associated with the hazardous wastes managed at the facility. This shall include products to be stored in the hazardous waste secondary containment system.

4. Within 60 days of the effective date of this permit, the Permittee shall provide documentation to Illinois EPA that the agreements and arrangements identified below have been made. Where necessary, documentation must be provided that any Illinois EPA identified in 35 IAC 724.153(b) declined to enter into an agreement or arrangement. The specific arrangements and agreements which must be made include:
- a. Arrangements to familiarize the local police department, local fire departments and other local emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility and possible evacuation routes.
  - b. Agreements designating primary emergency authority to a specific police department and a specific fire department, where more than one police department and fire department might respond to an emergency. Agreements should also be made with the other surrounding police and fire departments to provide support to the primary emergency authorities;
  - c. Agreements with state emergency response teams, emergency response contractors and equipment suppliers;

- d. Agreements to familiarize local hospitals with the properties of the hazardous wastes handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility.
- e. Arrangements to identify a single local emergency response agency as the primary agency which will coordinate activities required by these agencies during an emergency at the facility.

The facility should also attempt to develop emergency plans and coordination agreements with the state and local emergency entities identified above. The detail of the arrangements made with the local and state emergency entities will be dependent upon the types of wastes handled at the facility and the potential need for the services of the various entities.

- 5. The Permittee shall review all components of the contingency plan with the local emergency response entities at least once every twelve months. Copies of the meeting notes and list of attendees shall be placed in the facility's operating record and be available to Illinois EPA for review upon verbal or written request.
- 6. The Permittee shall modify the contingency plan to describe in detail the possible hazards to human health or the environment that may result from any hazardous waste (and products to be stored in the hazardous waste secondary containment system) related emergency (release, fire, or explosion). This information is necessary for the emergency coordinator to make a proper assessment of the emergency as required by 35 IAC 724.156(c) and (d). Specifically, the contingency plan must describe the hazards associated with releases and possible fires involving various hazardous wastes (and products to be stored in the hazardous waste secondary containment system) managed at the facility and the real impacts of such emergencies. Information which must be incorporated into the contingency plan includes:
  - a. The information identified in Condition 3 above.
  - b. An evaluation of the hazards associated with a release or possible fire involving the various hazardous wastes which may be managed at the facility.
  - c. An evaluation of the area which may potentially be impacted during a release or possible fire involving the various hazardous wastes (and products to be stored in the hazardous waste secondary containment system) managed at the facility.

The information to be incorporated into the contingency plan, as required by this condition, must first be approved in writing by Illinois EPA. A revised contingency plan which incorporates the required information must be submitted to Illinois EPA within sixty (60) days of the effective date of this permit.

7. If it is determined that adverse off-site impacts are possible as a result of a release, fire or explosion involving hazardous wastes (and products to be stored in the hazardous waste secondary containment system) at the facility, the Emergency Coordinator shall assess the "hazard potential" associated with the existing conditions of the facility at the beginning of each operating shift. The items which must be considered in this assessment include (1) the weather conditions (wind speed, wind direction, atmospheric stability, etc.) and associated dispersion characteristics of the atmospheric conditions, (2) the volume of the various types of hazardous wastes present at the facility, (3) the hazardous characteristics of the wastes on-site, including the products of combustion which may be produced in the event of a fire, (4) the emergency situations which may occur that day and (5) the waste management activities expected to be carried out that day. An evaluation of the potential off-site impacts through the use of commercially available models should also be completed as part of the assessment. The Illinois EPA is currently using the computer based model titled "ARCHIE" which is available from the Federal Emergency Management Agency (202/643-3484). These evaluations shall be documented in the operating record and be readily available for review by the Emergency Coordinator and the emergency response agencies in the event of an emergency.

L. SPECIAL REQUIREMENTS FOR IGNITABLE WASTES

The Permittee shall not store containers of ignitable (RCRA definition) wastes (or product to be stored in the hazardous waste secondary containment system) in the area where all other wastes or product are stored. This separation shall be in addition to the separation of incompatibles required by 35 IAC 724.277.

SECTION II  
STANDARD CONDITIONS  
GENERAL REQUIREMENTS

1. EFFECT OF PERMIT. The existence of a RCRA permit shall not constitute a defense to a violation of the Environmental Protection Act or Subtitle G, except for development, modification or operation without a permit. Issuance of this permit does not convey property rights or any exclusive privilege. Issuance of this permit does not authorize any injury to persons or property or invasion of other private rights, or infringement of state or local law or regulations. (35 IAC 702.181)
2. PERMIT ACTIONS. This permit may be modified, reissued or revoked for cause as specified in 35 IAC 703.270 through 703.273 and Section 702.186. The filing of a request by the Permittee for a permit modification or revocation, or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. (35 IAC 702.146)
3. SEVERABILITY. The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby. (35 IAC 700.107)
4. PERMIT CONDITION CONFLICT. In case of conflict between a special permit condition and a standard condition, the special condition will prevail. (35 IAC 702.160)
5. DUTY TO COMPLY. The Permittee shall comply with all conditions of this permit except for the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of the Environmental Protection Act and is grounds for enforcement action; permit revocation or modification; or for denial of a permit renewal application. (35 IAC 702.141 and 703.242)
6. DUTY TO REAPPLY. If the Permittee wishes to continue an activity allowed by this permit after the expiration date of this permit, the Permittee must apply for a new permit at least 180 days before this permit expires, unless permission for a later date has been granted by Illinois EPA. (35 IAC 702.142 and 703.125)
7. PERMIT EXPIRATION. This permit and all conditions herein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application (see

35 IAC 703.181-703.209) and through no fault of the Permittee Illinois EPA has not issued a new permit as set forth in 35 IAC 702.125.

8. NEED TO HALT OR REDUCE ACTIVITY NOT A DEFENSE. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (35 IAC 702.143)
9. DUTY TO MITIGATE. In the event of noncompliance with the permit, the permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment. (35 IAC 702.144)
10. PROPER OPERATION AND MAINTENANCE. The Permittee shall at all times properly operate and maintain all facilities and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory, and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit. (35 IAC 702.145)
11. DUTY TO PROVIDE INFORMATION. The Permittee shall furnish to Illinois EPA, within a reasonable time, any relevant information which Illinois EPA may request to determine whether cause exists for modifying, revoking and reissuing or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to Illinois EPA, upon request, copies of records required to be kept by this permit. (35 IAC 702.148)
12. INSPECTION AND ENTRY. The Permittee shall allow an authorized representative of Illinois EPA, upon the presentation of credentials and other documents as may be required by law, to:
  - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;



- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the appropriate Act, any substances or parameters at any location. (35 IAC 702.149)

13. MONITORING AND RECORDS. (35 IAC 702.150)

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste must be the appropriate method from Appendix A of 35 IAC 721. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846, latest versions; Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020, latest versions; or an equivalent method as specified in the approved Waste Analysis Plan.
- b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least 3 years from the date of the sample, measurement, report or application. These periods may be extended by request of Illinois EPA at any time. The permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the facility, and for disposal facilities for the post-closure care period as well.
- c. Records of monitoring information shall include:
  - i. The date(s), exact place, and time of sampling or measurements;
  - ii. The individual(s) who performed the sampling or measurements;
  - iii. The date(s) analyses were performed;
  - iv. The individual(s) who performed the analyses;
  - v. The analytical technique(s) or method(s) used; and

vi. The result(s) of such analyses. (35 IAC 702.150)

14. REPORTING PLANNED CHANGES. The permittee shall give notice to Illinois EPA as soon as possible of any planned physical alterations or additions to the permitted facility. For a new HWM facility, the permittee may not commence treatment, storage or disposal of hazardous waste; and for a facility being modified the permittee may not treat, store or dispose of hazardous waste in the modified portion of the facility, until:

- a. The permittee has submitted to Illinois EPA by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
- b.
  - 1. Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the condition of the permit; or
  - 2. If, within 15 days of the date of submission of the letter in paragraph (a), the permittee has not received notice from Illinois EPA of its intent to inspect, prior inspection is waived and the permittee may commence treatment, storage or disposal of hazardous waste. (35 IAC 703.244 and 702.152(a))

15. ANTICIPATED NONCOMPLIANCE. The Permittee shall give advance notice to Illinois EPA of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. For a new facility, the permittee shall not treat, store or dispose of hazardous waste; and for a facility being modified, the permittee shall not treat, store or dispose of hazardous waste in the modification portion of the facility, except as provided in Section 703.280, until:

- i. The permittee has submitted to Illinois EPA by certified mail or hand delivery a letter signed by the permittee and a registered professional engineer stating that the facility has been constructed or modified in compliance with the permit; and
- ii. Either:
  - a. Illinois EPA has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or
  - b. Within 15 days after the date submission of the letter in section i above, the permittee has not received notice from Illinois EPA of its intent to inspect, the permittee may commence treatment, storage or disposal of hazardous waste. (35 IAC 702.152(b) and 703.247)

16. TRANSFER OF PERMITS. This permit is not transferable to any person except after notice to Illinois EPA. Illinois EPA may require modification of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the appropriate Act. (See Sections 703.260 and 703.270, in some cases modification is mandatory.) (35 IAC 702.152(c))
17. MONITORING REPORTS. Monitoring results shall be reported at the intervals specified in the permit. (35 IAC 702.152(d))
18. COMPLIANCE SCHEDULES. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than specified in 35 IAC 702.162. (35 IAC 702.152(e))
19. TWENTY-FOUR HOUR REPORTING.
  - a. The Permittee shall report to Illinois EPA any noncompliance with the permit which may endanger health or the environment. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the following circumstances. This report shall include the following:
    - i. Information concerning the release of any hazardous waste that may cause an endangerment to public drinking water supplies.
    - ii. Information concerning the release or discharge of any hazardous waste or of a fire or explosion at the HWM facility, which could threaten the environment or human health outside the facility.
  - b. The description of the occurrence and its cause shall include:
    - i. Name, address, and telephone number of the owner or operator;
    - ii. Name, address, and telephone number of the facility;
    - iii. Date, time, and type of incident;
    - iv. Name and quantity of material(s) involved;
    - v. The extent of injuries, if any;

- vi. An assessment of actual or potential hazards to the environment and human health outside the facility, where applicable; and
  - vii. Estimated quantity and disposition of recovered material that resulted from the incident.
- c. A written submission shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance including exact dates and times and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. Illinois EPA may waive the five day written notice requirement in favor of a written report within fifteen days. (35 IAC 702.152(f) and 703.245(b))
20. OTHER NONCOMPLIANCE. The Permittee shall report all instances of noncompliance not otherwise required to be reported under Standard Conditions 17, 18, and 19, at the time monitoring reports, as required by this permit, are submitted. The reports shall contain the information listed in Standard Condition 19. (35 IAC 702.152(g))
21. OTHER INFORMATION. Where the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to Illinois EPA, the Permittee shall promptly submit such facts or information. (35 IAC 702.152(h))
22. REPORTING REQUIREMENTS. The following reports required by 35 Ill. Adm. Code 724 shall be submitted in addition to those required by 35 Ill. Adm. Code 702.152 (reporting requirements):
- a. Manifest discrepancy report: if a significant discrepancy in a manifest is discovered, the permittee must attempt to reconcile the discrepancy with the waste generator or transporter. If the discrepancy is not resolved within 15 days after receiving the waste, the permittee must immediately submit to Illinois EPA a letter describing the discrepancy and attempts to reconcile it and a copy of the manifest or shipping paper at issue. (35 IAC 724.172(b))
  - b. Unmanifested waste report: The permittee must submit to Illinois EPA within 15 days of receipt of unmanifested waste an unmanifested waste report on EPA form 8700-13B. (35 IAC 724.176)

- c. Annual report: an annual report must be submitted covering facility activities during the previous calendar year. (35 IAC 724.175)

23. SUBMITTAL OF REPORTS OR OTHER INFORMATION. All written reports or other written information required to be submitted by the terms of this permit shall be sent to:

Illinois Environmental Protection Agency  
Division of Land Pollution Control #24  
Planning and Reporting Section  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276

- 24. SIGNATORY REQUIREMENT. All permit applications, reports or information submitted to Illinois EPA shall be signed and certified as required by 35 IAC 702.126. (35 IAC 702.151)
- 25. CONFIDENTIAL INFORMATION. Any claim of confidentiality must be asserted in accordance with 35 IAC 702.103 and 35 IAC 161.
- 26. DOCUMENTS TO BE MAINTAINED AT FACILITY SITE. The Permittee shall maintain at the facility, until closure is complete, the following documents and amendments, revisions and modifications to these documents:
  - a. Waste analysis plan as required by 35 IAC 724.113(b) and this permit.
  - b. Personnel training documents and records as required by 35 IAC 724.116(d) and this permit.
  - c. Contingency plan as required by 35 IAC 724.153(a) and this permit.
  - d. Closure plan as required by 35 IAC 724.212(a) and this permit.
  - e. Cost estimate for facility closure as required by 35 IAC 724.242(d) and this permit.
  - f. Operating record as required by 35 IAC 724.173 and this permit.
  - g. Inspection schedules as required by 35 IAC 724.115(b) and this permit.

27. WASTE MINIMIZATION. The Permittee shall certify at least annually that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that he generates to the degree determined by the Permittee to be economically practicable, and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment, in accordance with 35 IAC 724.173(b)(9).

#### GENERAL FACILITY STANDARDS

28. NOTICE OF WASTE FROM A FOREIGN SOURCE. The permittee who has arranged to receive hazardous waste from a foreign source must notify Illinois EPA in writing at least four weeks in advance of the date the waste is expected at the facility. (35 IAC 724.112(a))
29. NOTICE OF WASTE FROM OFF-SITE. The Permittee who receives hazardous waste from an off-site source (except where the Permittee is also the generator), must inform the generator in writing that the permittee has the appropriate permits for, and will accept, the waste the generator is shipping. The Permittee must keep a copy of this written notice as part of the facility operating record. (35 IAC 724.112(b))
30. GENERAL WASTE ANALYSIS. The Permittee shall comply with the procedures described in the approved waste analysis plan. (35 IAC 724.113)
31. SECURITY. The Permittee shall comply with the security provisions of 35 IAC 724.114(b) and (c).
32. GENERAL INSPECTION REQUIREMENTS. The Permittee shall follow the approved inspection schedule. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by 35 IAC 724.115(c). Records of inspections shall be kept as required by 35 IAC 724.115(d).
33. PERSONNEL TRAINING. The Permittee shall conduct personnel training as required by 35 IAC 724.116 and shall maintain training documents and records as required by 35 IAC 724.116(d) and (e).
34. GENERAL REQUIREMENTS. The Permittee shall not store ignitable, reactive, or incompatible wastes at the facility.

#### PREPAREDNESS AND PREVENTION

35. DESIGN AND OPERATION OF FACILITY. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. (35 IAC 724.131)
36. REQUIRED EQUIPMENT. The Permittee shall equip the facility with the equipment set forth in the approved contingency plan, as required by 35 IAC 724.132.
37. TESTING AND MAINTENANCE OF EQUIPMENT. The Permittee shall test and maintain the equipment specified in condition 36 as necessary to assure its proper operation in time of emergency. Such testing and maintenance activities are set forth in the approved inspection schedule. (35 IAC 724.133)
38. ACCESS TO COMMUNICATIONS OR ALARM SYSTEM. The Permittee shall maintain access to the communications or alarm system as required by 35 IAC 724.134.
39. REQUIRED AISLE SPACE. The Permittee shall maintain aisle space as required by 35 IAC 724.135 and National Fire Protection Association (NFPA) requirements.
40. ARRANGEMENTS WITH STATE AND LOCAL AUTHORITIES AND EMERGENCY RESPONSE CONTRACTORS. The Permittee shall attempt to make emergency response arrangements with State and local authorities and agreements with State emergency response teams and emergency response contractors and equipment suppliers as required by 35 IAC 724.137. If State or local officials refuse to enter in preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

#### CONTINGENCY PLAN

41. IMPLEMENTATION OF PLAN. The provisions of the contingency plan must be carried out by the Permittee immediately whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment (35 IAC 724.151(b)). Within 15 days of any incident that requires implementation of the contingency plan, the owner or operator must submit a written report to Illinois EPA as required by 35 IAC 724.156(j).

- 42. COPIES OF PLAN. A copy of the contingency plan, including any revisions, must be maintained at the facility and submitted to all local police and fire departments, hospitals and state and local emergency response teams as required by 35 IAC 724.153.
- 43. AMENDMENTS TO PLAN. The Permittee shall review and immediately amend, if necessary, the contingency plan, as required by 35 IAC 724.154.
- 44. EMERGENCY COORDINATOR. A trained emergency coordinator shall be available at all times in case of an emergency as required by 35 IAC 724.155 and 724.156.

#### MANIFEST SYSTEM RECORD KEEPING AND REPORTING

- 45. MANIFEST SYSTEM. The Permittee shall comply with the manifest requirements of 35 IAC 724.171, 724.172 and 724.176.
- 46. OPERATING RECORD. The Permittee shall maintain a written operating record at the facility in accordance with 35 IAC 724.173.
- 47. ANNUAL REPORT. The Permittee shall prepare and submit an annual report to Illinois EPA prior to March 1st of each year in accordance with the requirements of 35 IAC 724.175.

#### CLOSURE

- 48. PERFORMANCE STANDARD. The Permittee shall close the facility as required by 35 IAC 724.211 and in accordance with the approved closure plan.
- 49. AMENDMENT TO CLOSURE PLAN. The Permittee must amend the closure plan whenever there is a change in the expected year of closure or whenever a change in the facility operation plans or facility design affects the closure plan pursuant to 35 IAC 724.212(c).
- 50. NOTIFICATION OF CLOSURE. The Permittee shall notify Illinois EPA at least 60 days prior to the date it expects to begin closure. (35 IAC 724.212(d))
- 51. TIME ALLOWED FOR CLOSURE. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste and complete closure activities in accordance with the schedule(s) specified in the closure plan. (35 IAC 724.213)



52. DISPOSAL AND/OR DECONTAMINATION OF EQUIPMENT. When closure is completed, the Permittee shall decontaminate and/or dispose of all facility equipment and structures as required by the approved closure (35 IAC 724.214) plan.
53. CERTIFICATION OF CLOSURE. When closure is completed, the Permittee shall submit certification to Illinois EPA in accordance with 35 IAC 724.215 that the facility has been closed as specified by the approved closure plans.
54. COST ESTIMATE FOR FACILITY CLOSURE. The Permittee's original closure cost estimate, prepared in accordance with 35 IAC 724.242, must be:
- a. Adjusted for inflation either 60 days prior to each anniversary of the date on which the first closure cost estimate was prepared or if using the financial test or corporate guarantee, within 30 days after close of the firm's fiscal year.
  - b. Revised whenever there is a change in the facility's closure plan increasing the cost of closure.
  - c. Kept on record at the facility and updated. (35 IAC 724.242)
55. FINANCIAL ASSURANCE FOR FACILITY CLOSURE. The Permittee shall demonstrate compliance with 35 IAC 724.243 by providing documentation of financial assurance, as required by 35 IAC 724.251, in at least the amount of the cost estimates required by the previous Permit Condition. Changes in financial assurance mechanisms must be approved by Illinois EPA pursuant to 35 IAC 724.243.
56. LIABILITY REQUIREMENTS. The Permittee shall demonstrate continuous compliance with the requirements of 35 IAC 724.247 and the documentation requirements of 35 IAC 724.251.
57. INCAPACITY OF OWNERS OR OPERATORS, GUARANTORS, OR FINANCIAL INSTITUTIONS. The Permittee shall comply with 35 IAC 724.248 whenever necessary.

#### LAND DISPOSAL RESTRICTIONS

58. DISPOSAL PROHIBITION. Any waste identified in 35 IAC Part 728, Subpart C, or any mixture of such a waste with non-restricted wastes, is prohibited from land disposal unless it meets the standards of 35 IAC Part 728, Subpart D, or unless it meets the requirements for exemptions under Subpart C. "Land disposal" means placement in or on the land and

includes, but is not limited to, placement in a landfill, surface impoundment, waste pile, injection well, land treatment facility, or vault intended for disposal.

59. DILUTION PROHIBITION. The Permittee shall not in any way dilute a restricted waste or residual from treatment of a restricted waste as a substitute for adequate treatment in order to achieve compliance with 35 IAC 728, Subpart D (35 IAC 728.103).

60. WASTE ANALYSIS.

1. The Permittee must test his waste or extract developed, using the test method identified in Appendix I of 40 CFR Part 268, or use knowledge of the waste, to determine if the waste is restricted from land disposal.
2. For any waste with treatment standards expressed as concentrations in the waste extract, the Permittee must test the treatment residues or an extract of such residues developed using the test method described in Appendix I of 40 CFR Part 268, to assure that the treatment residues or extract meet the applicable treatment standard.
3. If the treatment residues do not meet the treatment standards, or if the Permittee ships any restricted wastes to a different facility, the Permittee shall comply with the requirements applicable to generators in 35 IAC 728.107 and 728.150(a)(1).

61. STORAGE RESTRICTIONS

1. The Permittee shall not store hazardous wastes restricted from land disposal under 35 IAC Part 728, Subpart C unless such wastes are stored only in containers or tanks, and are stored solely for the purpose of the accumulation of such quantities as is necessary to facilitate proper recovery, treatment, or disposal, and: (1) each container is clearly marked to identify its contents and the date each period of accumulation begins; (2) each tank is clearly marked to identify its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, as required by 35 IAC 728.150.
2. The Permittee must comply with the operating record requirements of 35 IAC 724.173.

62. NEW DETERMINATIONS OF PROHIBITED WASTES

Wastes which are prohibited from land disposal under 35 IAC Part 728, Subpart C, or for which treatment standards have been established under 35 IAC 728, Subpart D, subsequent to the date of issuance of this permit, shall be subject to the conditions number 58 through 61 above.

SECTION III  
CORRECTIVE ACTION

- A. In accordance with Section 3004 of RCRA and 35 IAC 724.201, the Permittee shall institute such necessary corrective action as to protect human health and the environment from all releases of hazardous wastes and hazardous constituents, listed in Appendix H of 35 IAC Part 721, from any solid waste management unit (SWMU) at its Melrose Park, Illinois facility.
- B. The Permittee shall submit to the Illinois Environmental Protection Agency's Division of Land Pollution Control (Illinois EPA's DLPC) Permit Section, within ninety (90) days after the effective date of this permit, a written RCRA Facility Investigation (RFI) Phase I Workplan to document the absence or presence of hazardous waste or hazardous constituents in the groundwater, surface water, sediments, soils, and air from the following solid waste management units. This is a listing of SWMUs identified in the RCRA Facility Assessment (RFA) that must be addressed in the RFI and is not a complete listing of SWMUs at the subject facility.
1. Waste Handling Area, at truck dock;
  2. Fuel Oil Spill Area, located outside on the west side of facility building;
  3. Tank Car Unloading Area, located along the railroad tracks on northern edge of the facility property; and

The requirements for this RFI Phase I Workplan are outlined in Attachment E. Illinois EPA's DLPC will approve, modify and approve, or disapprove and provide comments to the Permittee as to the corrections or modifications needed for the RFI Phase I Workplan. Within 30 days of receipt of such comments, the Permittee must modify the plan or submit a new plan for Illinois EPA's DLPC approval. Within 30 days of Illinois EPA's DLPC approval of the RFI Phase I Workplan, the Permittee shall begin implementing the Workplan according to the terms and schedule in the Workplan.

- C. If Illinois EPA's DLPC determines, based on the data obtained from the Phase I Workplan, that there has been no release of hazardous waste or hazardous constituents to the environment from the SWMU(s) identified above, no further action will be required for the SWMU(s). If Illinois EPA's DLPC determines, based on the data, that there has been a release of hazardous waste or hazardous constituents to the environment or that the data is inconclusive, the Permittee will be notified by Illinois EPA's DLPC. The Permittee must then submit a RFI Phase II Workplan to determine the rate and extent of migration of hazardous

waste or hazardous constituents and the concentrations of the hazardous waste or hazardous constituents in the groundwater, surface water, sediments, soils, and air. Illinois EPA's DLPC will approve, modify and approve, or disapprove and provide comments to the Permittee as to the corrections or modifications needed for the RFI Phase II Workplan. Within 30 days of receipt of such comments, the Permittee must modify the plan or submit a new plan for Illinois EPA's DLPC approval. Within 30 days of Illinois EPA's DLPC approval of the RFI Phase II Workplan, the Permittee shall begin implementing the plan according to the terms and schedule established by Illinois EPA.

- D. Illinois EPA's DLPC will determine, based on the RFI Phase II final report, whether corrective measures are necessary for the SWMU(s) addressed in the RFI. If Illinois EPA's DLPC determines that corrective measures are not necessary, no further investigative action or corrective action will be required for the SWMU(s) addressed in the RFI. If corrective measures are determined to be necessary, Illinois EPA's DLPC will notify the Permittee in writing and will identify target cleanup objectives that any corrective measures would be expected to meet. Within 120 days of receipt of this written notification, the Permittee shall submit to Illinois EPA's DLPC a Corrective Action Plan (CAP). The purpose of the CAP is to develop and evaluate corrective action alternative(s) and to outline one or more alternative corrective measure(s) which will satisfy the target cleanup objectives specified by Illinois EPA's DLPC. Illinois EPA's DLPC will approve, modify and approve, or disapprove and provide comments to the Permittee as to the corrections or modifications needed for the CAP. Within 60 days of receipt of such comments, the Permittee must modify the CAP or submit a new CAP for Illinois EPA's DLPC approval. Illinois EPA's DLPC approval of one or more of the corrective measure(s) will consider performance, reliability, implementability, safety, human health and environmental impact of the measure(s). The formal approval and incorporation of the selected corrective measure(s) into the Part B Permit will be via the Class 2 Permit Modification procedures identified in 35 IAC 703.282. The Permittee shall begin implementing the selected corrective measure(s) according to the terms and schedule identified in the modified permit.

E. FINANCIAL ASSURANCE FOR CORRECTIVE ACTION

1. The Permittee shall prepare a cost estimate for the completion of any corrective action required under this permit, in order to provide financial assurance for completion of corrective action, as required under 35 IAC 724.201(b). Such cost estimate will be based upon the cost of construction, operation, inspection, monitoring, and maintenance of the corrective measure(s) and the cost of undertaking at least the RFI, to meet the requirements of 35 IAC 724.201, Attachment E and this permit. This cost estimate must be submitted to Illinois EPA's DLPC and revised according to the following schedule.

Facility Submission

Due Date

Initial Cost Estimate (with  
the RFI Phase I Workplan)

90 Days after effective  
date of this permit

Revised Cost Estimate (with  
the initial submittal of the  
RFI Report)

To be established by the  
Illinois EPA following approval  
of the RFI workplan

2. The Permittee shall demonstrate continuous compliance with 35 IAC 724.201 by providing documentation of financial assurance using a mechanism specified in 35 IAC 724.243, in at least the amount of the cost estimate required under Condition E.1. The words "completion of corrective action" shall be substituted for "closure and/or post-closure," as appropriate in the financial instrument specified in 35 IAC 724.251. The documentation shall be submitted to Illinois EPA's DLPC within 60 days after the submittal of the initial or revised cost estimates required under Condition E.1. Illinois EPA's DLPC may accept financial assurance for completion of corrective action in combination with another financial mechanism that is acceptable under 35 IAC 724.246 at its discretion.

F. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF  
NEWLY-IDENTIFIED SOLID WASTE MANAGEMENT UNIT(S)

1. The Permittee shall notify Illinois EPA's DLPC in writing of any newly-identified SWMU(s) (i.e., a unit not specifically identified during the RFA), discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means, no later than fifteen (15) calendar days after discovery.
2. After such notification, Illinois EPA's DLPC may request, in writing, that the Permittee prepare a Solid Waste Management Unit (SWMU) Assessment Plan and a proposed schedule of implementation and completion of the Plan for any additional SWMU(s) discovered subsequent to the issuance of this Permit.
3. Within sixty (60) calendar days after receipt of Illinois EPA's DLPC request for a SWMU Assessment Plan, the Permittee shall prepare a SWMU Assessment Plan for determining past and present operations at the unit, as well as any sampling and analysis of ground water, land surface and subsurface strata, surface water or air, as necessary to determine whether a release of hazardous waste or hazardous constituents from such unit(s) has occurred, is likely to have occurred, or is likely to occur. The

SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste and hazardous constituents from the newly-discovered SWMU(s) to the environment.

4. After the Permittee submits the SWMU Assessment Plan, Illinois EPA's DLPC shall either approve, approve with modifications, or disapprove the Plan in writing.

If Illinois EPA's DLPC approves the Plan, the Permittee shall begin to implement the Plan within fifteen (15) calendar days of receiving such written notification.

If Illinois EPA's DLPC disapproves the Plan, Illinois EPA's DLPC shall notify the Permittee in writing of the Plan's deficiencies and specify a due date for submittal of a revised Plan.

5. The Permittee shall submit a SWMU Assessment Report to Illinois EPA's DLPC no later than fifteen (15) calendar days from completion of the work specified in the approved SWMU Assessment Plan. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan. At a minimum, the Report shall provide the following information for each newly-identified SWMU:
  - a. The location of the newly-identified SWMU in relation to other SWMUs on a scaled map or drawing;
  - b. The type and past and present function of the unit;
  - c. The general dimensions, capacities, and structural description of the unit (supply any available drawings and specifications);
  - d. The period during which the unit was operated;
  - e. The specifics on all materials, including but not limited to, wastes and hazardous constituents, that have been or are being managed at the SWMU, to the extent available; and
  - f. The results of any sampling and analysis required for the purpose of determining whether releases of hazardous wastes or hazardous constituents have occurred, are occurring, or are likely to occur from the unit.

6. Based on the results of this Report, Illinois EPA's DLPC shall determine the need for further investigations at specific unit(s) covered in the SWMU Assessment. If Illinois EPA's DLPC determines that such investigations are needed, Illinois EPA's DLPC may require the Permittee to prepare a plan for such investigations. This plan will be reviewed for approval as part of a RFI Workplan.

G. FUTURE RELEASES FROM SWMUs

Whenever the Permittee becomes aware that any SWMU, that was not found to be releasing hazardous waste or hazardous constituents during the RFI, or was not addressed under the corrective action requirements of this permit, may have started to release hazardous waste or hazardous constituents, the Permittee shall report this information to Illinois EPA's DLPC in writing within 15 days of discovery. The Permittee shall determine the nature and extent of the contamination by following the procedures set forth in Conditions B through E, beginning on the date of notification, rather than the effective date of the permit.

H. COMPLETION OF CORRECTIVE ACTION

The Permittee shall complete corrective action for all releases of hazardous waste or hazardous constituents from the SWMU's specified in Condition B, or from any other SWMU at the facility, as necessary to protect human health and the environment. The Permittee may request to Illinois EPA's DLPC to consider corrective action complete at any point during compliance with this permit. The petition should include a demonstration of the following:

1. The Permittee shall demonstrate that there have been no releases and shall also describe how releases will be prevented in the future, of hazardous waste or hazardous constituents to any media from the SWMUs; or
2. The Permittee shall demonstrate that all releases of hazardous waste or hazardous constituents to all media have been remediated to Illinois EPA approved target cleanup objectives and shall also describe how releases will be prevented in the future; or
3. Some combination of the above demonstrations; and
4. Appropriate documentation and certification.

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The Permittee shall be notified in writing if Illinois EPA's DLPC approves the request that the corrective action can be considered complete. The notification from Illinois EPA's DLPC to the Permittee may include a release from the financial requirements of Condition E.

A determination of no further action shall not preclude Illinois EPA's DLPC from requiring continued or periodic inspections of the SWMU(s) or continued or periodic monitoring of air, soil, ground water, or surface water, when site-specific circumstances indicate that releases of hazardous wastes including hazardous constituents are likely to occur, if necessary to protect human health and the environment.

A determination of no further action shall not preclude Illinois EPA's DLPC from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU at the facility that is likely to pose a threat to human health or the environment. In such a case, Illinois EPA's DLPC shall initiate a permit modification to rescind the determination of no further action.



SECTION IV  
REPORTING AND NOTIFICATION REQUIREMENTS

The reporting and notification requirements of each section of the RCRA permit are summarized below. This summary is provided to highlight the various reporting and notification requirements of this permit.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
Section I: CONTAINER STORAGE		
J.	Submit certification documentation for construction to Illinois EPA.	Within 30 Days after completion of new container storage area construction.
H.1.	Notify Illinois EPA of intent to close container storage area.	At least 180 days prior to commencement of closure.
H.1.	Submit decontamination and/or soil sampling and analysis plan for review.	At least 180 days prior to commencement of closure.
H.4.	Submit application for modification of permit and closure and post-closure care plan.	No later than 60 days after determination that container storage area cannot be clean closed.
H.5.	Update financial assurance.	No later than 30 days after permit modification is effective.
H.6.	Submit certification for closure of container storage area.	No later than 60 days after closure of container storage area is complete.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
Section II: STANDARD CONDITIONS		
6	Complete application for new permit.	At least 180 days prior to permit expiration.
11	Information requested by Illinois EPA and copies of records required to be kept by this permit.	Reasonable time.
14	Notify Illinois EPA of planned physical alterations or additions.	At least 15 days prior to planned change.
15	Notify Illinois EPA of changes which may result in permit noncompliance.	
16	Application for permit modification indicating permit is to be transferred.	
18	Submission of any information required in a compliance schedule.	Within 14 days after each schedule date.
19	Report to Illinois EPA any non-compliance which may endanger health or environment.	
	telephone	Within 24 hours after discovery.
	in writing	Within 5 days after discovery.
20	Report all other instances of noncompliance.	March 1 of each year along with Annual Report.
28	Notify Illinois EPA in writing of expected receipt of hazardous waste from foreign source.	At least 4 weeks prior to receipt of waste.

<u>Condition</u>	<u>Submittal</u>	<u>Due Date</u>
41	Implementation of Contingency Plan.	
	Notify appropriate state and local agencies with designated response roles.	As needed.
	Notify appropriate local officials.	Immediately, if emergency coordinator's assessment indicates evacuation of local area is advisable.
	Notify Illinois EPA (217/782-3637) or Illinois ESDA (217/782-7860) if emergency coordinator determines there has been a release, fire or explosion which could threaten human health or the environment, outside the facility.	Immediately after determination made.
	Notify Illinois EPA and appropriate state and local authorities, in writing that facility is in compliance with 35 IAC 724.156(h).	Prior to resuming operation in affected areas.
	Report to Illinois EPA details regarding incident which required implementation of contingency plan.	Within 15 days after event.
47	Submit annual report required by 35 IAC 724.175.	March 1 of each year.
49	Application for permit modification amending closure plan.	
50	Notify Illinois EPA that expecting to close.	At least 180 days prior to beginning closure.

SECTION V  
SPECIAL CONDITIONS

1. All hazardous and non-hazardous special wastes generated by this facility and transported off-site for recycling, treatment or disposal must be transported in accordance with the special waste stream permit and Illinois manifest system, the applicable regulations in 35 IAC, Parts 709, 722, 723, 807 and 809, and the conditions of the applicable waste stream permits.
2. Special wastes received at the site for storage/transfer shall be transported to the facility utilizing Illinois EPA's special waste authorization system and manifest system.
3. All loading/unloading of special wastes shall be accomplished over spill containment devices which are constructed of non earthen materials and have been coated with a compatible impermeable coating and has been sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation.
4. Detrex shall select a coating or lining and submit the specifications for the coating and a proposed installation schedule to Illinois EPA for approval within ninety (90) days after the effective date of this permit.
5. The Permittee shall provide the spill containment devices, the curbs and walls that are used as containment, with an impermeable surface coating or lining that:
  - a. is compatible with the waste, or any other liquid, stored in the containment system, and
  - b. will prevent migration of the waste into the concrete of the slab, wall or curb.
6. Detrex shall perform a complete inspection of the surface coating or lining yearly and perform annual maintenance to insure the integrity of the coating.
7. It shall not be an act of non-compliance if the coating or lining has been installed properly but does not live up to the manufacture's printed performance standards and/or if the coating or lining fails due to excessive wear or chemical breakdown. The Permittee shall notify Illinois EPA within thirty (30) days of becoming aware of the failure. The facility shall request modification of its permit to install a new coating within 180 days.

8. The Permittee shall construct concrete slabs, walls and curbs that are used as containment with chemical-resistant water stops in place at all joints or install a compatible caulking or sealant at each existing joint. These joints include but are not limited to, all construction joints within the slab, walls and curbs and joints between the slab and curb, between two curbs, between the slab or curb and wall, and joints between two walls. The water stops, caulking or sealant shall be compatible with the transferred waste.
9. The areas where tank trucks are unloading shall be inspected after each use. Any release of waste observed during these inspections must be responded to immediately. Such response shall include containing and collecting the released material and removing all contaminated material.
10. Detrex shall cover the manhole located in the driveway with a polypropylene cover before loading/unloading of special waste.

ATTACHMENT A

WASTE LISTS AND HAZARDOUS WASTE  
IDENTIFICATION NUMBERS

ILD074424938

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ATTACHMENT A

EPA HAZARDOUS WASTE NO.

HAZARDOUS WASTE  
BASED ON TOXICITY  
CHARACTERISTICS

D004	Arsenic
D005	Barium
D018	Benzene
D006	Cadmium
D019	Carbon Tetrachloride
D021	Chlorobenzene
D022	Chloroform
D007	Chromium
D027	1,4-Dichlorobenzene
D028	1,2-Dichloroethane
D029	1,1-Dichloroethylene
D030	2,4-Dinitrotoluene
D034	Hexachloroethane
D008	Lead
D009	Mercury
D035	Methyl ethyl ketone
D036	Nitrobenzene
D010	Selenium
D011	Silver
D039	Tetrachloroethylene
D040	Trichloroethylene
D043	Vinyl Chloride

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EPA HAZARDOUS WASTE NO.

F001

HAZARDOUS WASTE

The following spent halogenated solvents used in degreasing tetrachloroethylene, trichloroethylene, methylene chloride, 1,1,1-trichloroethane and trichlorotrifluoroethane; all spent solvent mixtures and blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004 or F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.

F002

The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, and 1,1,2-trichloro-1,2,2-trifluoroethane; all spent solvent mixtures and blends containing before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F001, F004, or F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.



ATTACHMENT B  
CERTIFICATION DOCUMENTATION  
FOR CONSTRUCTION

ILD074424938

LPC #0311860003

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When submitting certifications required by this Part B permit for construction of any new unit, please complete the attached certification form. This will help to ensure that the submittal reaches its proper destination and the certification will meet the regulatory requirements. Sending the Field Operations Section (F.O.S.) copy directly to the Field Office is acceptable as long as all copies have a completed copy of the enclosed form attached and you advise the Permit Section, in writing, that a copy has been sent to F.O.S.

A documentation report and as-built drawings (sealed and signed by an Illinois Professional Engineer) must be included with this certification. Information necessary to document the construction of the unit and to support the certification must be contained within the report. This report should include a thorough description of all construction data and drawings and should be formatted in a logical and orderly manner. The construction documentation report must contain at least the following items:

1. An introduction and summary which describes the scope and purpose of the project;
2. A description of all construction activities, including quality assurance and quality control;
3. As-built drawings of the unit and a description of any deviations from the plans and specifications approved in the permit;
4. A description of the test methods used and justification for any deviations from standard test methods;
5. A summary of test results, identification of any samples which did not meet the specifications and the corrective action and retesting which was undertaken in response to any failing test results;
6. Any necessary information associated with construction of the unit to document that construction was in accordance with the plans and specifications approved by the permit;
7. Information specifically required by the permit; and
8. Any available photographs of the unit.

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### CERTIFICATION

This statement is to be completed by both the responsible officer and the registered professional engineer upon completion of construction in accordance with 35 IAC Section 702.126. Submit one copy of the certification with original signatures and two additional copies. Forward these certification statements and any information required by the permit to the following address:

Illinois Environmental Protection Agency  
Division of Land Pollution Control -- #33  
Permit Section  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

FACILITY NAME: Detrex Corporation, Melrose Park, Illinois

Illinois EPA SITE CODE: LPC #0311860003

U.S. EPA ID NO.: ILD074424938

PART B PERMIT LOG #113

PERMIT (OR MODIFICATION) ISSUANCE DATE:

PERMIT CONDITION NO. REQUIRING CERTIFICATION:

The \_\_\_\_\_ has been constructed in accordance with the specifications in the Part B. Documentation that the construction was in accordance with the permit is contained in the enclosed report. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
Signature of Owner/Operator

\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Signature of Registered P.E.

\_\_\_\_\_  
Name of Registered P.E. and  
Illinois Registered Number

\_\_\_\_\_  
Date

\_\_\_\_\_  
(P.E. Seal)

ATTACHMENT C  
CLOSURE CERTIFICATION FORMS

ILD074424938

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### ATTACHMENT C

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

The hazardous waste management unit at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
USEPA ID Number

\_\_\_\_\_  
Facility Name

\_\_\_\_\_  
Signature of Owner/Operator

\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Signature of Registered P.E.

\_\_\_\_\_  
Name of Registered P.E. and  
Illinois Registration Number

\_\_\_\_\_  
Date

TABLE I: INSPECTION SCHEDULE  
FOR HAZARDOUS WASTE STORAGE AREA

<u>Inspection Item</u>	<u>Frequency</u>	<u>Procedure</u>
1. Check container placement, stacking, aisle space and segregation	Daily	Visual
2. Check containers for adequate seals, open lids, and loose bungs	Daily	Visual
3. Check container labels	Daily	Visual
4. Check containers for corrosion, leaks, deformation	Daily	Visual
5. Check pallets for damage	Daily	Visual
6. Check the concrete floor for cracks, deterioration, wet spots	Weekly	Visual
7. Check the concrete ramps and curbs for settlement, cracks, wet spots	Weekly	Visual
8. Check the containment system for spills, leaks, stains	Weekly	Visual
9. Check the locks on gates and doors	Daily	Visual/Physical

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<u>Inspection Item</u>	<u>Frequency</u>	<u>Procedure</u>
10. Check the warning signs	Weekly	Visual
11. Check the loading/ unloading area for obstructions, spills, leaks, stains	Daily (When in use)	Visual

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TABLE II: INSPECTION SCHEDULE  
FOR EMERGENCY AND SAFETY EQUIPMENT

<u>Inspection Item</u>	<u>Frequency</u>	<u>Procedure</u>
1. Absorbent Material	Weekly	Visual
2. Forklift	Weekly	Visual/Physical
3. Fire Extinguishers	Weekly	Visual
4. First Aid Kit	Weekly	Visual
5. Eye Wash Station/ Safety Shower	Weekly	Visual/Physical
6. Respirator	Weekly	Visual
7. Self-contained Breathing Apparatus	Weekly	Visual/Physical
8. Protective Clothing	Weekly	Visual
9. Intercom	Daily	Visual/Physical
10. Alarm System	Monthly	Visual/Physical
11. Sump Pump	Weekly	Visual/Physical
12. Polypropylene Pad	Weekly	Visual



ATTACHMENT E

REQUIRED SCOPE OF WORK FOR a RCRA

FACILITY INVESTIGATION

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Scope of Work for a RCRA Facility Investigation  
Detrex Corporation ILD074424938  
LPC #0311860003  
Part B Log #113

This Scope of Work relates specifically to the RCRA Facility Investigation (RFI) of the solid waste management units identified in Section III of the RCRA Permit, which the Permittee is required to perform under the terms of their RCRA permit. In this Scope of Work, "Illinois EPA's DLPC" refers to the Illinois Environmental Protection Agency's Division of Land Pollution Control, "Permittee" refers to Detrex Corporation and "SWMU" refers to Solid Waste Management Unit.

I. PURPOSE

The purpose of the RFI is to determine the nature, the rate and extent of migration, and the concentrations of hazardous waste or hazardous constituents, if any, released from SWMU's into the groundwater, surface water, sediments, soil and air. This information will be used to help determine the need, scope and design of a corrective action program.

II. SCOPE OF WORK

The Scope of Work is divided into two phases. The purpose of Phase I is to demonstrate conclusively whether or not any releases of hazardous wastes or hazardous constituents have occurred from those SWMUs identified in Section III of the RCRA permit. Phase II will be implemented if Illinois EPA's DLPC determines from the data obtained from Phase I that releases of hazardous waste or hazardous constituents have occurred or that the data is inconclusive. The purpose of Phase II is to characterize the extent and rate of migration and concentration of the hazardous waste or hazardous constituents and to implement interim corrective action measures, if it is determined by Illinois EPA's DLPC to be necessary. Each phase of the investigation is divided into three Subparts. The first Subpart deals with the development by the Permittee of a RFI Workplan. The second Subpart addresses the implementation of the RFI. The final Subpart covers the submission of reports of activities and results of the RFI. The requirements for the three Subparts are as follows.

III. RFI WORKPLANS

The Permittee shall prepare a detailed workplan for Phase I implementation as per the schedule in this Attachment of the permit. The Phase II Workplan shall be submitted upon written request by Illinois EPA's DLPC.

The plans shall contain at a minimum the following information. Information provided by the Phase I study may be incorporated into the Phase II Workplan by reference. Information already submitted in the Part B permit application may be incorporated by reference into both workplans when appropriate.

a. FACILITY BACKGROUND

The Permittee shall submit as part of the RFI Phase I Workplan the following information:

1. Delineate the extent and construction of the SWMUs;
2. Describe the history of the utilization of the SWMUs and the surrounding areas;
3. Describe all materials managed and/or disposed at the SWMUs including, but not limited to, solid wastes, hazardous wastes, and hazardous constituents to the extent they are known or suspected over the life of the facility;
4. Describe all significant surface features (ponds, streams, depressions, etc.) and wells within 1,500 feet of the facility;
5. Describe all land usage within 1,500 feet of the facility, including all known SWMUs;
6. Describe and locate all human populations and environmental systems susceptible to contaminant exposure from releases from the SWMUs within a distance of at least 1,500 feet;
7. Describe any interim corrective action measures which were or are being planned or undertaken at the facility;
8. A history and description of past and present ownership and operation of solid and hazardous waste generation, storage, treatment and disposal activities at the facility;
9. Approximate dates or periods of past spills or releases, identification of material spilled, amount spilled, location, and a description of the response actions, including any inspection reports or technical reports generated as a result of the spill or release.

B. SITE MAP

The Permittee shall submit as part of the draft RFI Phase I Workplan a current topographic map(s) showing a distance of at least 1,500 feet around the facility at a scale of one inch equal to not more than 200 feet. Contours shall be shown on the map, with the contour interval being sufficient to clearly show the pattern of surface water flow. The map shall clearly show the following:

1. Map scale, North arrow, date, and location of facility with respect to Township, Range and Section;
2. Topography and surface drainage depicting all waterways, wetlands, 100-year floodplain, drainage patterns, and surface water areas;
3. Property lines, with the owners of all adjacent property clearly indicated;
4. Surrounding land use;
5. Locations and boundaries of all solid waste, including hazardous waste, management units, both past and present;
6. All injection and withdrawal wells; and
7. All buildings, tanks, piles, utilities, paved areas, easements, rights-of-way, and other features including all known past and present product and waste underground tanks or piping.

The map(s) shall be of sufficient detail and accuracy to locate and report all current and future work performed at the site.

C. NATURE AND EXTENT OF CONTAMINATION

The Permittee shall submit as part of the RFI Phase I Workplan, a description of the existing information on the nature and extent of contamination at the facility.

1. The Permittee's report shall summarize all possible source areas of contamination. At a minimum, this should include all regulated units, solid waste management units, spill areas, and other suspected source areas of contamination. For each area the Permittee shall identify the following:

- a. Location of unit/area;
  - b. Quantities of solid and hazardous wastes;
  - c. Hazardous waste and hazardous constituents, to the extent known; and
  - d. Identification of areas where additional information is necessary.
2. The Permittee shall prepare an assessment and description of the existing degree and extent of contamination based on existing information. This should include:
- a. Available monitoring data and qualitative information on locations and levels of contamination at the facility;
  - b. All potential migration pathways including relevant information on geology, pedology, hydrogeology, physiography, hydrology, water quality, meteorology, and air quality; and
  - c. The potential impact on human health and the environment, including demography, groundwater and surface water uses, and land use.

D. ADMINISTRATIVE OUTLINE

The Permittee shall submit as part of the RFI Phase I Workplan a general outline of the Phase I Workplan defining the RFI objectives, technical approach, and scheduling of tasks. The Permittee shall prepare a Project Management Plan as part of the Phase I Workplan which will include a discussion of the technical approach, schedules, budget, and personnel. The Project Management Plan must also include a description of the qualifications of personnel performing or directing the RFI, including contractor personnel. This plan shall also document the overall management approach to the RFI. In order to show progression scheduling of tasks, a bar chart format must be provided, with day zero as the approval date of the Workplan. An equivalent outline shall be prepared for the Phase II Workplan if one is required by Illinois EPA's DLPC.

E. SITE-SPECIFIC SAMPLING PLANS-PHASE I and PHASE II

The Permittee shall prepare detailed site-specific sampling plans which address all field activities needed to obtain site-specific data. The plans must contain: a statement of sampling objectives, specifications of equipment, analyses of interest, sample types,

sample locations and schedules for sampling. Wherever possible, SW-846 (Third Edition) sampling, analysis and statistical methods shall be utilized. The plans must address all levels of the investigations, as well as types of investigations conducted, and must include groundwater, soils and sediments, air, and surface water sampling. The plans must describe in detail how each phase will be implemented. The Phase I Sampling Plan must be able to determine the presence or absence of specific hazardous waste or hazardous constituents released to the environment and must also describe the criteria that will be used to determine the presence or absence of releases. This Phase I Sampling Plan shall be submitted as part of the RFI Phase I Workplan. The Phase II Sampling Plan must be able to determine the nature, rate and extent, and concentrations of those hazardous wastes and hazardous constituents that have been found to have been released to the environment in the Phase I Study.

The Phase I Sampling Plan must include provisions for sampling and analysis of all hazardous wastes and hazardous constituents, either suspected or known to have been disposed, treated or stored in those units identified in Section III of the permit. The Illinois Phase II Plan must, at a minimum, provide for sampling and analysis of all hazardous wastes and hazardous constituents identified as being released in Phase I. The specific constituents to be sampled and analyzed will be determined separately for each affected SWMU.

1. Soils Investigation

- a. The Phase I Plan must provide for a determination of the presence or absence of release of hazardous waste and hazardous constituents into the soil around and under the SWMUs. The plan must include, but is not limited to:
  - (1) A description and characterization of the soils in and around the SWMUs down to the water table including, but not limited to, the following:
    - (a) Unified soil classification;
    - (b) Soil profile; and
    - (c) Elevation of water table;

- (2) The parameters and hazardous constituents to be used to establish the presence or absence of a plume of contamination. These must include, but need not be limited to, specific hazardous constituents of wastes known or suspected to have been placed in the SWMUs;
  - (3) The basis for selecting the parameters and constituents in (2) above;
  - (4) The methodology for choosing sampling locations, depths, and numbers of samples;
  - (5) Sampling procedures for each parameter or constituent to be analyzed. All soil samples to be taken must be handled in accordance with 40 CFR 261, Appendix III and Illinois EPA's DLPC soil volatile sampling procedure if volatiles are to be analyzed;
  - (6) Analytical methods to be used in the analysis of the samples. If any of these methods is not consistent with those specified in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (U.S. EPA SW-846), a complete description of the methods to be used and the justification for not using the SW-846 methods must be provided, and
  - (7) Procedures and criteria for evaluating analytical results to establish the presence or absence of any contamination.
- b. If Illinois EPA's DLPC determines from the data obtained during the Phase I investigation that releases of hazardous waste or hazardous constituents have occurred, or the data is inconclusive, the Permittee shall submit a Phase II Workplan to characterize the contamination of the soil. This workplan shall address and/or include, at a minimum:
- (1) A description of what is known about the horizontal and vertical extent of the contamination;
  - (2) A description of contaminant and soil chemical properties within the contaminant source area and plume, including solubility, specification, absorption, leachability, exchange capacity, biodegradability, hydrolysis, photolysis, oxidation and other factors that might affect contaminant migration and transformation (if known);

- (3) Specific contaminant concentrations (if known);
- (4) The velocity and direction of contaminant movement (if known);
- (5) An extrapolation of future contaminant movement (if known); and
- (6) The methods and criteria to be used to define the boundaries of the plume(s) of contamination.

2. Hydrogeologic and Hydrologic Investigation

The Phase II sampling plan, if required, must provide descriptions of groundwater monitoring systems which will be capable of (1) determining whether or not any releases have occurred from the SWMUs and (2) will provide adequate data on the nature, extent and rate, and concentration of any releases identified.

Ground water monitoring will not be required for a SWMU if the permittee can demonstrate, based on the soils investigations in Section 1 above, that no releases have occurred from the SWMU (as determined by Illinois EPA's DLPC). If releases are determined to have occurred at a particular unit, then the Phase II workplan may have to address a hydrological investigation, including groundwater monitoring at that unit. The Permittee will be notified of the requirement to perform a hydrological investigation and groundwater monitoring for a specific SWMU at the time Illinois EPA notifies the Permittee that a Phase II Workplan is required.

Phase II groundwater monitoring efforts, if required, shall begin with a survey of previous hydrogeologic studies and other existing related data. The results of the survey shall be summarized in the Phase II report and summary.

- a. Except to the extent that adequate existing hydrogeologic data already exist which can be used in the investigation, a plan for evaluating groundwater flow patterns shall be designed to provide the following information:
  - (1) A description of the regional geologic and hydrogeologic characteristics in the vicinity, including local stratigraphy, regional hydrogeologic flow and areas of recharge and discharge;



- (2) An analysis of any topographic or geomorphic features that might influence the groundwater flow system;
  - (3) A classification and description of the hydrogeologic properties of all of the hydrogeologic units found at the site down to the first bedrock aquitard, including: hydraulic conductivity and porosity, texture, uniformity and lithology; an interpretation of hydraulic interconnections between saturated zones; and zones of significant fracturing or channeling in the unconsolidated and consolidated deposits;
  - (4) Using the facility map as a base, isopach and structural contour maps, and at least two (2) geologic cross sections showing the extent (depth, thickness, lateral extent) of all hydrogeologic units within the facility boundary, down to the first bedrock aquitard, identifying: all units in the unconsolidated and consolidated deposits; zones of higher permeability or lower permeability that might direct or restrict the flow of contaminants; perched aquifers; and the first saturated zone that may have a potential for migration of contaminants;
  - (5) A description of water level or fluid pressure monitoring, including: water level contour maps and vertical gradient sections, well or piezometer hydrographs and interpretation of the flow system, interpretation of any changes in hydraulic gradients, and seasonal fluctuation; and
  - (6) A description of any man-made influences that may affect the hydrogeology of the site, identifying local water supply and production wells and other man-made hydraulic structures.
- b. Sampling and analysis of all wells shall be carried out in accordance with the approved Data Collection Quality Assurance Plan as required in III.F. below. The Plan shall provide information on the design and installation of all groundwater monitoring wells. The designs shall be in accordance with the latest version of the Technical Enforcement Guidance Document (TEGD) and the latest version of Illinois EPA's DLPC design criteria. At a minimum:

- (1) The groundwater monitoring system must consist of monitoring wells in the uppermost aquifer and in each underlying aquifer, such as the sand units, which are hydraulically interconnected;
  - (2) At least one background monitoring well in each aquifer shall be installed hydraulically upgradient (i.e., in the direction of increasing static head) from the limit of the SWMU, except to the extent SWMUs in close proximity can be investigated with the same background well system. The number, locations, and depths must be sufficient to yield groundwater samples that are:
    - (a) representative of background quality in the uppermost aquifer and aquifers hydraulically interconnected beneath the facility; and
    - (b) not affected by any SWMUs.
  - (3) Monitoring wells in each aquifer shall be installed hydraulically downgradient (i.e., in the direction of decreasing static head) at the limit of the SWMU or at the limit of each group of proximate SWMUs. Their number, locations, and depths must ensure that they immediately detect any statistically significant amounts of hazardous waste or hazardous constituents that migrate from the SWMU(s).
- c. The sampling plan must specify:
- (1) The parameters and constituents to be used to establish the presence or absence of a plume of contamination. These must include, but need not be limited to, specific hazardous constituents of wastes known or suspected to have been placed in or released from the SWMUs (including any possible degradation products);
  - (2) The basis for selecting the parameters and constituents in (1) above;
  - (3) The methodology for investigating the hydrostratigraphic units at site, and the locations, depths and concentration specifications for each monitoring well to be used in the initial sampling effort;
  - (4) Sampling procedures for each parameter or constituent to be analyzed, including schedules for sampling;

- (5) Analytical methods to be used in the analysis of the samples. If any of these methods is not consistent with those specified in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (U.S. EPA SW-846), a complete description of the methods to be used and the justification for not using the SW-846 methods will be provided; and
- (6) Procedures and criteria for evaluating analytical results to establish the presence or absence of any plume of contamination.
- (7) Proposal for establishing the locations, depths, and construction specifications for monitoring wells necessary to delineate the extent of any plume. The methodology of the investigation, sampling procedures, analytical methods, and procedures for evaluating analytical results to establish the extent of the plume must be described. The workplan must also specify the criteria to be used to determine the limits of the plume.

3. Surface Water and Sediment

- a. The Phase I Workplan must provide for a determination of the presence or absence of releases of hazardous wastes and hazardous constituents into all surface waters or their sediments potentially affected by the SWMUs. A determination of "no impact" must be justified and documented to the satisfaction of Illinois EPA's DLPC. The plan must include, but is not limited to:
  - (1) Description and characterization of all potentially affected surface waters, including locations, areas, depths, inflows and outflows, volumes of water, seasonal fluctuations, flooding tendencies, drainage patterns, on-site and off-site affected populations and activities;
  - (2) Description and characterization of sediment characteristics associated with all surface waters, including deposition areas, thickness profiles, and physical and chemical parameters;
  - (3) The parameters and constituents to be used to establish the presence or absence of a plume of contamination. This must include, but need not be limited to, specific hazardous constituents of wastes known or suspected to have been placed in the SWMUs;

- (4) The basis for selecting the parameters and constituents in (3) above;
  - (5) The methodology for choosing sampling locations depths, and numbers of samples;
  - (6) Sampling procedures for each parameter of constituent to be analyzed;
  - (7) Analytical methods to be used in the analysis of the samples. If any of these methods are not identical to those specified in Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, (U.S. EPA SW-846), a complete description of the methods to be used and the justification for not using the SW-846 methods will be provided; and
  - (8) Procedures and criteria for evaluating analytical results to establish the presence or absence of any plume of contamination.
- b. If Illinois EPA's DLPC determines from the data obtained during the Phase I investigation that releases of hazardous waste or hazardous constituents have occurred or that the data is inconclusive, the Permittee shall submit a Phase II Workplan to characterize the contamination of the surface waters and sediments. The workplan shall include, at a minimum:
- (1) A description of the horizontal and vertical extent of any plumes and the extent of contamination in the underlying sediments (if known);
  - (2) Specific contaminant concentrations (if known);
  - (3) The horizontal and vertical direction and velocity of contaminant movement (if known);
  - (4) An evaluation of the physical, biological, and chemical factors influencing contaminant movement (if known);
  - (5) An extrapolation of future contaminant movement (if known); and
  - (6) The criteria used to define the boundaries of the plumes.

4. Air

- (a) The Phase I Workplan must provide for an investigation to characterize the particulate and gaseous contaminants released into the atmosphere. A determination of "no impact" must be justified and documented to the satisfaction of Illinois EPA's DLPC. This investigation shall provide the following information:
  - (1) A description of the horizontal and vertical direction and velocity of contaminant movement;
  - (2) The rate and amount of release; and
  - (3) The chemical and physical composition of the contaminants released, including horizontal and vertical concentration profiles.

The Permittee shall document the procedures used in making the above determinations.

- (b) The Phase I Workplan must provide for characterizing the climate in the vicinity of the facility. Such information shall include, but not be limited to:
  - (1) A description of the following parameters:
    - (a) Annual and monthly rainfall averages;
    - (b) Monthly temperature averages and extremes;
    - (c) Wind speed and direction;
    - (d) Relative humidity and dew point;
    - (e) Atmospheric pressure;
    - (f) Evaporation data;
    - (g) Development of inversions; and
    - (h) Climate extremes that have been known to occur in the vicinity of the facility, and the frequency of occurrence.

- (2) A description of topographic and manmade features which affect air flow and emission patterns, including:
  - (a) Ridges, hills or mountain areas;
  - (b) Canyons or valleys;
  - (c) Surface water bodies;
  - (d) Wind breaks and forests;
  - (e) Buildings; and
  - (f) Other man-made features.

5. Source Characterization

The Phase I Workplan must provide for the collection of analytical data to completely characterize the hazardous wastes and/or hazardous constituents and the areas where hazardous wastes and/or hazardous constituents have been released, placed, collected or removed including: type, quantity, physical form, disposition (containment or nature of deposits); and facility characteristics affecting releases. This shall include quantification of the following specific characteristics at each source area:

- a. Unit/Disposal Area Characteristics:
  - (1) Location of unit/disposal area;
  - (2) Type of unit/disposal area;
  - (3) Design features;
  - (4) Operating practices (past and present);
  - (5) Period of operation;
  - (6) Age of unit/disposal area;

- (7) General physical conditions;
  - (8) Structural integrity (cracks, joints, gaps, patches, maintenance history, etc.); and
  - (9) Method used to close the unit.
- b. Waste or Hazardous Constituent Characteristics
- (1) Type of waste or hazardous constituents placed in the units:
    - (a) Source, if known;
    - (b) Hazardous classification;
    - (c) Quantity; and
    - (d) Chemical composition.
  - (2) Physical and chemical characteristics:
    - (a) Physical form (solid, liquid, gas);
    - (b) Physical description;
    - (c) Temperature;
    - (d) pH;
    - (e) General chemical class (e.g. acid, solvent);
    - (f) Molecular weight;
    - (g) Density;
    - (h) Boiling point;
    - (i) Viscosity;

- (j) Solubility in water;
  - (k) Cohesiveness of the waste;
  - (l) Vapor pressure; and
  - (m) Flash point.
- (3) Migration and dispersal characteristics of the waste:
- (a) Sorption;
  - (b) Biodegradability, bioconcentration;
  - (c) Photodegradation rates;
  - (d) Hydrolysis rates; and
  - (e) Chemical transformations.

The Permittee shall justify and document the procedures used in making the above determinations.

6. Potential Receptors

The Phase I Workplan must provide for collection of data describing the human populations and environmental systems within a radius of 1,500 feet of the facility boundary. The following characteristics shall be identified:

- a. Local uses and possible future uses of groundwater:
  - (1) Type of use (e.g. municipal or residential drinking water source, industrial, etc.); and
  - (2) Location of groundwater users, including wells and discharge areas.
- b. Local uses and possible future uses of surface waters draining the facility:
  - (1) Domestic and municipal;



- (2) Recreational;
  - (3) Agricultural;
  - (4) Industrial; and
  - (5) Environmental.
- c. Human use of, or access to, the facility and adjacent lands, including, but not limited to:
- (1) Recreation;
  - (2) Agriculture;
  - (3) Residential;
  - (4) Commercial;
  - (5) Zoning; and
  - (6) Location between population locations and prevailing wind direction.
- d. A description of the biota in surface water bodies on, adjacent to, or affected by the facility.
- e. A description of ecology of, and adjacent to the facility.
- f. A demographic profile of the people who use or have access to the facility and adjacent land, including, but not limited to: age, sex, and sensitive subgroups.
- g. A description of any endangered or threatened species near the facility.

F. DATA COLLECTION QUALITY ASSURANCE

The Permittee shall prepare a plan to document all monitoring procedures, sampling, field measurements, and sample analysis performed during the investigation so as to ensure that all information, data and resulting decisions are technically sound,

statistically valid, and properly documented. This shall be submitted with the RFI Phase I Workplan.

Quality Assurance. Sampling methods and equipment, as well as laboratory analytical methods, shall follow guidance in U.S. EPA's SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (see 40 CFR 260.11). Field sampling methods, including soil sampling, not included in SW-846 must be approved by Illinois EPA's DLPC before they are used in the RFI. This includes methods such as drilling, borings, etc. When available, standard procedures, as defined by U.S. EPA, Illinois EPA or ASTM, should be followed. All soil samples which are to be taken must be handled in accordance with 40 CFR, Part 261, Appendix III and Illinois EPA's soil volatile sampling procedures if volatile sampling is required. The analytical methods which will be used must be specified and must be EPA-approved.

Soil samples for volatile organics analysis require specialized sampling and handling procedures. Under no circumstances should soil samples for volatile organic analysis be mixed, composited or otherwise aerated.

G. DATA MANAGEMENT PLAN

The Permittee shall develop and initiate a Data Management Plan to document and track investigation data and results. This Plan shall identify and set up data documentation materials and procedures, project file requirements, and project-related progress reporting procedures and documents. The Plan shall also provide the format to be used to present the raw data and conclusions of the investigation. This shall be submitted with the RFI Phase I Workplan.

1. Data Record

The data record shall include the following:

- a. Unique sample or field measurement code;
- b. Sampling or field measurement location and sample or measurement type;
- c. Sampling or field measurement raw data;
- d. Laboratory analysis ID number;

- e. Property or component measured; and
- f. Result of analysis.

2. Tabular Displays

The following data shall be presented in tabular displays:

- a. Unsorted (raw) data;
- b. Results for each medium and for each constituent monitored;
- c. Statistical analysis;
- d. Sorted data by potential stratification factors (e.g., location, soil layer, topography); and
- e. Summary data.

3. Graphical Displays

The following data shall be presented in graphical formats (e.g., bar graphs, line graphs, area or plan maps, isopleth plots, cross-sectional plots or transects, three dimensional graphs, etc.):

- a. Sampling location and sampling grid;
- b. Boundaries of sampling area, and areas where more data are required;
- c. Levels of contamination at each sampling location;
- d. Extent of contamination;
- e. Changes in concentrations in relation to the distance from the source, time, depth or other parameters; and
- f. Features affecting intermedia transport including potential receptors.

#### H. IMPLEMENTATION OF INTERIM MEASURES

The Permittee shall document and submit information on any interim measures which have been or are to be undertaken to abate threats to human health and the environment while the RFI or CAP are being completed. This information shall include, at a minimum:

1. Objectives of the interim measures: how the measure is mitigating a potential threat to human health and the environment and/or is consistent with and integrated into any long term solution at the facility;
2. Design, construction, and maintenance requirements;
3. Schedules for design and construction; and
4. Schedules for progress reports.

If Illinois EPA determines that interim measures are necessary to protect human health or the environment, the Permittee will be notified by way of a permit modification.

#### I. HEALTH AND SAFETY PLAN

Under the provisions of 29 CFR 1910 (54 FR 9,295, March 6, 1989), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

#### IV. IMPLEMENTATION OF RFI

The Permittee shall conduct those investigations necessary to characterize the site, and to determine the nature, rate and extent of migration, and concentrations of hazardous waste and hazardous constituents, if any, released from the SWMU's into the surface water and sediments, groundwater, air, and soil. The investigations must be of adequate technical

content to support the development and evaluation of a corrective action program, if one is deemed necessary by Illinois EPA's DLPC.

The investigation activities shall follow the plans and procedures set forth in the Workplan(s) and the RFI schedule. Any actual or anticipated deviations from the Workplan(s) or the RFI schedule shall be reported no later than the time of submission of the next quarterly report subsequent to the determination of need or actual deviation from the Workplan.

V. SUBMISSION OF REPORTS AND RESULTS OF RFI ACTIVITIES

The Permittee must prepare and submit quarterly progress reports and a final report on the activities and results of the Phase I RFI activities and, if required, Phase II RFI activities. The quarterly reports shall contain at a minimum:

- A. An estimate of the percentage of the investigation completed;
- B. Summary of activities completed during the reporting period;
- C. Summaries of all actual or proposed changes to the Workplan or its implementation;
- D. Summaries of all actual or potential problems encountered during the reporting period;
- E. Proposal for correcting any problems;
- F. Projected work for the next reporting period; and
- G. Other information or data as requested in writing by Illinois EPA's DLPC.

The primary objective of the Phase I final report is to conclusively determine either the presence or absence of releases of hazardous waste or hazardous constituents to the groundwater, surface water, air, sediments, and soil. If it is determined by Illinois EPA's DLPC that there have been no releases, Illinois EPA's DLPC may recommend that further investigation is not needed. If the evidence is either inconclusive or confirms a release, Illinois EPA's DLPC will require Phase II of the plan be implemented. The final report of Phase II will be required to document the extent, rate and type of contamination at the site. The results of both phases of the investigation must be of sufficient content and quality to support and develop a corrective action program if one is deemed necessary by Illinois EPA's DLPC. Illinois EPA's DLPC will provide comments on all final draft reports. The final reports must adequately address these comments. The following table summarizes the implementation and reporting schedule to be followed by the Permittee.

RFI IMPLEMENTATION SCHEDULE

Facility Action	Due Date
Submission of RFI Phase I Workplan	Within 90 days after effective date of the permit
Completion of RFI Phase I investigation and submission of Phase I Report and Summary	Within 6 months after approval by Illinois EPA's DLPC of Phase I Workplan
Submission of RFI Phase II Workplan	Within 60 days after notification of the need of Phase II by Illinois EPA's DLPC
Completion of RFI Phase II investigation and submission of Phase II Report and Summary	To be negotiated with Illinois EPA's DLPC during review of Phase II workplan
Quarterly Progress Reports	Due to the <u>Illinois EPA's DLPC by:</u>  April 15 July 15 October 15 January 15 of each year
Submission of Implementation of Interim Measures Report	Within 30 days from the date interim measures were determined to be necessary

ECB:SPG:bjh\982691S.WPD

ATTACHMENT -- F

Closure Cost Estimate  
for  
Hazardous Waste Storage Area

ILD07442938

LPC #0311860003

Part B Log #113

April, 1998  
LPC #0311860003  
Part B Log No. 113  
Page F-1 -- F-1

**ATTACHMENT--F**

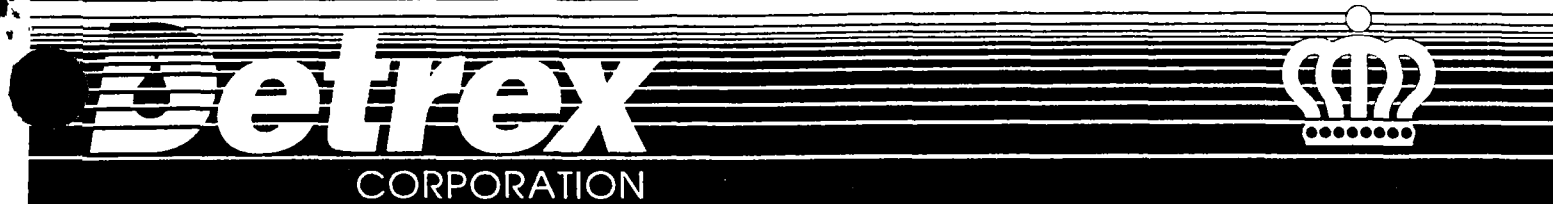
(Closure Cost Estimate 1997\$)

Closure Cost for the 27,500 gallon Hazardous Waste Container Storage Area, at Detrex Corporation (Melrose Park Facility).

Closure Cost approved as per Log B-113-M-7      \$82,034

ECB:SPG:bjh\982691S.WPD





P.O. BOX 5111 • SOUTHFIELD, MI 48086-5111 • (810) 358-5800 • FAX (810) 358-5803

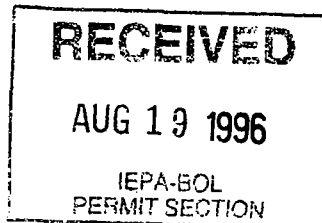
August 15, 1996

VIA: Certified Mail

Ed Bakowski, Section Manager  
Permit Section, Bureau of Land  
2200 Churchill Road  
PO Box 19276  
Springfield, IL 62794-9276

RE:

Class 1 Modification - Closure Cost Recalculation  
Detrex Facility  
2537 LeMoyne Ave.  
Melrose Park IL 60160  
EPA ID# ILD 074 424 938  
RCRA Permit Log No. 113-M-1  
LPC# 03118660003



Dear Mr. Bakowski:

At the present time Detrex Corporation utilizes a Surety Bond and a Letter of Credit to meet with the Financial Requirements for Closure as required under 40 CFR § 264.143(c) & (d). In January of last year Detrex Corporation began a detailed review of the closure cost estimates associated with its Part B Permit Applications. A review of the Melrose Park Facility closure costs indicated that the estimate submitted in 1991 is much higher than present costs. As such, a revised cost estimate was generated and submitted to the State of Illinois's Environmental Protection Agency, Financial Assurance Section for review.

Although the reduction was approved by the Financial Section, it appears that a copy of the request, including a revised closure cost estimate, was not sent to your section. As such, Detrex Corporation is submitting a revised closure cost estimate.

The new closure cost for the Melrose Park Facility, based on the attached closure cost estimate, is \$ 104,398. The values used in calculating these costs were obtained from:

1. a price quote letter from OMNI regarding disposal costs; and
2. a price sheet (labeled as confidential) from Four Seasons Environmental for labor costs.

The latest closure cost estimate is lower than the estimate submitted in January of 1995, due to the disposal costs obtained from OMNI. All costs provided in these documents have been updated to 1996 values using the Implicit Price Deflator.

On behalf of our request ACSTAR, the insurance company Detrex has secured to provide the Surety Bond, submitted a request to the ILEPA's Financial section in May of this year to reduce our present bond from \$160,000 to \$ 125,000. The hold up on the approval, per a recent conversation with Mr. Andrew Volmer of the Financial Section, is that they have not received approval from your group on the reduction. As such, Detrex would appreciate anything which could be done on your end to expedite the processing of the revised closure cost estimate.

Should you have any further questions on this matter please feel free to give me a call.

Sincerely,



David Craig, CHMM, CET  
Manager of Environmental and Safety Compliance

Enclosures:

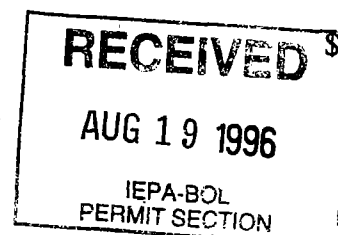
Revised Closure Cost Update (August 1996)  
Letter from OMNI  
Price Sheet from Four Seasons Environmental (confidential)

cc:

File  
Facility  
S. Miles - Detrex

**ATTACHMENT I-3  
CLOSURE COST ESTIMATE (1996 \$)**

<i>Item</i>	<i>Activity</i>	<i>Estimated Cost</i>
1.	Removal of final waste inventory (from container storage area - 500 drums)	
	a) transfer drum inventory from storage areas to waste vehicles	
	- labor: 2 man days @ \$264/day	\$ 528
	- supervision: 1 man day @ \$309/day	309
	- protective safety equipment @ \$114/man day	<u>342</u>
	Subtotal 1	\$ 1,179
2.	Transportation and Disposal of Waste Inventory at Permitted Off-Site Facility	
	a) transportation 8 loads @ \$1,500/load	\$ 12,000
	b) disposal 27,500 gallons @ \$1.55/gallon	<u>42,625</u>
	Subtotal 2	\$ 64,625
3.	Sweep and steam clean drum storage facility floor area (including disposal of 25 pallets)	
	a) disposal of 1 drum of sweepings and 15 drums of pallets @ \$231	\$ 3,465
	b) disposal of 300 gallons of waste wash water @ \$0.91/gal.	273
	c) Transportation of wastes	1,500
	c) labor: 4 man days @ \$264/day	1,056
	d) supervision: 2 man days @ \$309/day	618
	e) collect rinsate samples and analyze @ \$205/sample	1,640
	f) protective safety equipment @ \$114/man day	<u>684</u>
	Subtotal 3	\$ 9,236
4.	Visual Examination of Container Storage Area	550
	a) Collect Concrete Core Samples and analyze @ \$ 1,250	3,750
	b) Equipment for sampling @ \$ 400 / day	<u>400</u>
	Subtotal 4	\$ 4,700



Date: 08/15/96

Revision: 96-1

Attachment: I-3

**ATTACHMENT I-3  
CLOSURE COST ESTIMATE (1996 \$)**

<i>Item</i>	<i>Activity</i>	<i>Estimated Cost</i>
5.	Closure Certification	
a)	outside consultant to review final closure plans and certify closure 10 days @ \$569/day	\$ 5,690
b)	disbursements including office expenses and travel expenses	<u>1,138</u>
	Subtotal 5	\$ 6,828
	Subtotal 1 + 2 + 3 + 4 + 5	\$ 77,332
	Administration (15%)	11,600
	Contingency (20%)	<u>15,466</u>
	<b>Total Estimated Final Closure Cost</b>	<b><u>\$104,398</u></b>

CONFIDENTIAL

HAZARDOUS / EMERGENCY RESPONSE PERSONNEL

<u>Code</u>	<u>Description</u>	<u>Reg. Rates</u>	<u>OT. Rates</u>
PE-01	Haz Mat Response Manager	\$70.00/hour	\$105.00/hour
PE-02	Health and Safety Officer	\$60.00/hour	\$90.00/hour
PE-03	Haz Mat Response Foreman	\$55.00/hour	\$87.50/hour
PE-04	Haz-Mat Equipment Operator	\$45.00/hour	\$67.50/hour
PE-05	Haz Mat Response Technician	\$45.00/hour	\$67.50/hour

NON-HAZARDOUS / EMERGENCY RESPONSE PERSONNEL

PE-06	Em Response Manager	\$60.00/hour	\$90.00/hour
PE-07	Em Response Foreman	\$45.00/hour	\$67.50/hour
PE-08	Health and Safety Officer	\$45.00/hour	\$67.50/hour
PE-09	Em Response Technician	\$35.00/hour	\$52.50/hour
PE-10	Em Response Equipment Operator	\$35.00/hour	\$52.50/hour

X REMOVAL / REMEDIAL PERSONNEL

PR-11	Project Manager	\$60.00/hour	\$90.00/hour
PR-12	Explosives / Blaster	\$75.00/hour	\$112.50/hour
PR-13	Project Foreman	\$45.00/hour	\$67.50/hour
PR-14	Explosives Technician	\$45.00/hour	\$67.50/hour
PR-15	Health and Safety Officer	\$45.00/hour	\$67.50/hour
PR-16	Equipment Operator	\$35.00/hour	\$52.50/hour
PR-17	Remedial Technician II	\$33.00/hour	\$49.50/hour
PR-18	Remedial Technician I	\$30.00/hour	\$45.00/hour

INDUSTRIAL PERSONNEL

PI-10	Industrial Project Manager	\$45.00/hour	\$67.50/hour
PI-11	Industrial Foreman	\$35.00/hour	\$52.50/hour
PI-12	Industrial Technician	\$30.00/hour	\$45.00/hour
PI-13	Safety Technician	\$30.00/hour	\$45.00/hour
PI-14	Equipment Operator	\$30.00/hour	\$45.00/hour

ON-SITE TREATMENT SERVICES PERSONNEL

PT-01	Project Manager	\$60.00/hour	\$90.00/hour
PT-02	Project Foreman	\$45.00/hour	\$67.50/hour
PT-03	Permitting Specialist	\$45.00/hour	\$67.50/hour
PT-04	Equipment Operator	\$35.00/hour	\$52.50/hour
PT-05	Technician H	\$40.00/hour	\$60.00/hour
PT-06	Technician I	\$30.00/hour	\$45.00/hour

PROFESSIONAL PERSONNEL

PX-01	Senior Project Manager	\$90.00/hour	\$90.00/hour
PX-02	Program Manager	\$80.00/hour	\$80.00/hour
PX-03	NCP Response Manager	\$75.00/hour	\$85.00/hour
PX-04	Project Geologist/Engr.	\$70.00/hour	\$70.00/hour
PX-05	Staff Geologist/Engr..	\$55.00/hour	\$55.00/hour
PX-06	Waste Water Treatment Operator	\$55.00/hour	\$50.00/hour
PX-08	Field Chemist	\$45.00/hour	\$60.00/hour
PX-09	Chemical Technician		
PX-OTH	This code covers all other personnel		

07-1995 10:43 OMNI P.01

# Omni/Southeastern Chemical

Harold Talbert, Vice President Marketing  
PO Box 1755  
Sumter, SC 29151-1755  
803-773-1400  
Fax: 803-775-7016

## FAX TRANSMISSION COVER SHEET

Date: July 31, 1995

To: Mr. David Creighton

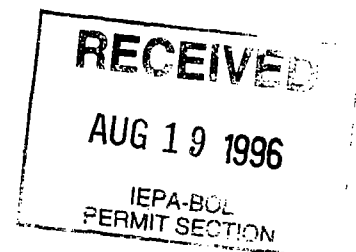
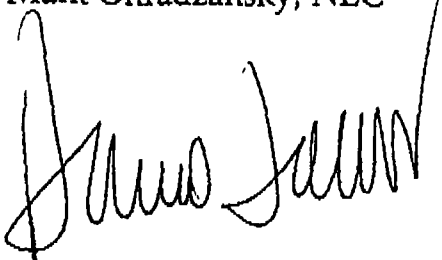
810-799-7193

YOU SHOULD RECEIVE 2 PAGE(S), INCLUDING THIS COVER SHEET IF  
YOU DO NOT RECEIVE ALL THE PAGES, PLEASE CALL Ext. 108.

Enclosed is a copy of Anna's letter. Southeastern Chemical, Sumter can only handle waste codes, F001, F002, F003, F005 and D001. Our sister company North East Chemical, Cleveland, Ohio can handle all of the waste codes listed except D005, D051, K085, D012, D013, D016, D020, D031, D037, D041, D042, U044, U057, U072, U075, U076, U077, U078, U110, U113, U121, U127, U131, U180, U196, U208 and U209.

The price per drum (55 gallons) is regular solvent pricing at \$32.00 liquid, \$116.00 sludge, \$225.00 solids. Metal wastes will carry a \$100.00 per drum surcharge. Pure chlorinated wastes such as Perc, MCL, III Tri, etc. will be at \$50.00 per drum. Other chlorinated wastes will be \$80.00 per drum for liquids. A tax of \$3.23 per drum will apply. Prices are FOB Southeastern Chemical and FOB North East Chemical in Cleveland, Ohio.

cc: Mark Ohradzansky, NEC



# DETREX CORPORATION

P.O. Box 5111, Southfield, MI 48086-5111



FAX: (313) 358-5803

TELEPHONE:  
(313) 358-5800

July 28, 1994

George Hamper  
USEPA Region V  
RCRA Permitting Branch  
230 South Dearborn St.  
Chicago, IL 60604

**RECEIVED**  
AUG 10 1994

**OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V**

RE:  
Detrex Corporation  
Melrose Park, IL  
EPA ID #: ILD 074 424 938

**RECEIVED**  
WASTE MANAGEMENT DIVISION

SEP 20 1994

Dear George Hamper :

B. 1. 5

As required under 40 CFR § 270.42(a)(i) we are providing notification to you of Class 1 changes recently made to our permit. The changes involve the recalculation of the cost of closure to incorporate actual industry costs. It should be noted that this change will not have any effect on the present operating parameters of the facility.

These changes have been approved by Illinois's Department of Environmental Protection as minor changes incidental to normal operations.

If you should have any questions on this subject matter please feel free to give me a call.

Sincerely,

David Craig  
Corporate Environmental and Safety Engineer

CC:  
Facility File  
Facility  
ILEPA

HD/FILES/TSDFs/FACILITY/A-ILLINOIS/ILEPA/PERMIT/NOT1



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

USEPA

Mary A. Gade, Director  
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

May 10, 1994

Detrex Corporation  
David Craig, Corporate Environmental  
and Safety Engineer  
P.O. Box 5111  
Southfield, MI 48086-5111

Re: 03118660003 -- Cook County  
Detrex Corporation  
ILD074424938  
Log No. 113-M-2  
Received: 2/24/94  
RCRA Permit Modification

RECEIVED  
WMD RECORD CENTER

AUG 15 1994

Dear Mr. Craig:

This letter is written in response to your letter of February 24, 1994 pertaining to the updated list of Emergency Coordinators due to a management change at your facility. The Agency has reviewed the information contained in your submittal and determined no further action is required other than making the submittal a part of the approved permit application. This determination is based upon a review of (1) the RCRA permit issued to Detrex, (2) the regulations (35 IAC 703 Appendix A (B)(6)(d)), and (3) the information contained in your submittal. Your request is hereby approved subject to the following condition:

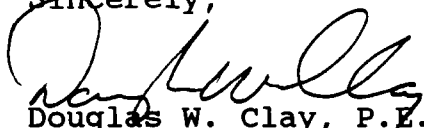
1. Pursuant to 35 IAC Section 703.281(a)(2), a notice of the modification shall be sent to all persons on the facility mailing list, maintained by the Agency per 35 IAC Section 705.165(a)(4), and the appropriate units of State and local government, as specified in 35 IAC Section 705.163(a)(5). This notification must be made within ninety (90) calendar days of the date of this letter.

Since this was a minor modification, that did not result in any changes in the language of the permit, only the cover page of the permit reflecting this change is being sent to you. This letter and the Permit cover page should be attached to the front of your permit.



Should you have any questions regarding this matter, please contact Ron Rybolt at 217/524-3868.

Sincerely,



Douglas W. Clay, P.E.  
Hazardous Waste Branch Manager  
Permit Section, Bureau of Land

DWC:RGR

cc: USEPA Region V -- George Hamper



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

### HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

Operator

Detrex Corporation  
Attention: Mr. Daniel Anderson  
Branch Manager  
2537 LeMoyne Avenue  
Melrose Park, Illinois 60160

IEPA #0311860003 -- Cook County  
USEPA ILD074424938  
Detrex Corporation, Melrose Park Facility  
RCRA Permit Log No. 113-M-2

Owner

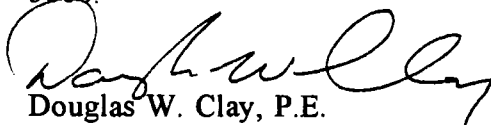
Clauss Industrial District  
Attention: Mr. Richard R. Lareno  
Managing Agent  
21150 Prestwick Drive  
Barrington, Illinois 60010

Issue Date: September 30, 1992  
Effective Date: November 4, 1992  
Expiration Date: November 4, 2002  
Modification Date: May 10, 1994

A RCRA Part B Permit is hereby granted pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (I.A.C.) parts 702, 703, 705, and 720 through 729 to the Detrex Corporation Melrose Park facility to construct/maintain and operate a waste management facility involved in the storage of hazardous waste. Detrex Corporation is located at 2537 LeMoyne Avenue, Melrose Park, Illinois.

This permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and Title 35 I.A.C. Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 1/2, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which is issued. This Permit contains 74 pages including attachments A through E.

If you have any questions regarding this Part B Permit, please contact Ron Rybolt at 217/524-3868.

  
Douglas W. Clay, P.E.  
Manager Hazardous Waste Branch  
Permit Section, Bureau of Land

DWC:RGR



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

USEPA

Mary A. Gade, Director  
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

July 14, 1994

Detrex Corporation  
David Craig, Corporate Environmental  
and Safety Engineer  
P.O. Box 5111  
Southfield, MI 48086-5111

RECEIVED  
WMD RECORD CENTER

AUG 15 1994

Re: 03118660003 -- Cook County  
Detrex Corporation  
ILD074424938  
Log No. 113-M-3  
Received: 4/18/94  
RCRA Permit Modification

Dear Mr. Craig:

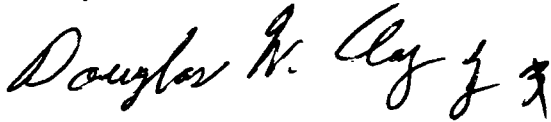
This letter is written in response to your letter dated April 13, 1994 pertaining to the revisions to the Part B Permit Application made necessary due to the recalculations of the closure costs for the above facility. The Agency has reviewed the information contained in your submittal and determined no further action is required other than making the submittal a part of the approved permit application. This determination is based upon a review of (1) the RCRA permit issued to Detrex, (2) the regulations (35 IAC 703 Appendix A (D)(1)(b)), and (3) the information contained in your submittal. Your request is hereby approved subject to the following condition:

1. Pursuant to 35 IAC 703.281(a)(2), a notice of the modification shall be sent to all persons on the facility mailing list, maintained by the Agency per 35 IAC 705.165(a)(4), and the appropriate units of state and local government, as specified in 35 IAC 705.163(a)(5). This notification must be made within ninety (90) calendar days of the date of this letter.

Since this was a minor modification, that did not result in any changes in the language of the permit, only the cover page of the permit reflecting this change is being sent to you. This letter and the Permit cover page should be attached to the front of your permit.

Should you have any questions regarding this matter, please contact Ron Rybolt at 217/524-3300.

Sincerely,

A handwritten signature in cursive script that reads "Douglas W. Clay".

Douglas W. Clay, P.E.  
Hazardous Waste Branch Manager  
Permit Section, Bureau of Land

DWC:RGR  
JK

cc: USEPA Region V -- Kelley Moore



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

### HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

#### Operator

Detrex Corporation  
Attention: Mr. Daniel Anderson  
Branch Manager  
2537 LeMoyne Avenue  
Melrose Park, Illinois 60160

IEPA #0311860003 -- Cook County  
USEPA ILD074424938  
Detrex Corporation, Melrose Park Facility  
RCRA Permit Log No. 113-M-3

#### Owner

Clauss Industrial District  
Attention: Mr. Richard R. Laren  
Managing Agent  
21150 Prestwick Drive  
Barrington, Illinois 60010

Issue Date: September 30, 1992  
Effective Date: November 4, 1992  
Expiration Date: November 4, 2002  
Modification Date: July 14, 1994

A RCRA Part B Permit is hereby granted pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (I.A.C.) parts 702, 703, 705, and 720 through 729 to the Detrex Corporation Melrose Park facility to construct/maintain and operate a waste management facility involved in the storage of hazardous waste. Detrex Corporation is located at 2537 LeMoyne Avenue, Melrose Park, Illinois.

This permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and Title 35 I.A.C. Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 1/2, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which is issued. This Permit contains 74 pages including attachments A through E.

If you have any questions regarding this Part B Permit, please contact Ron Rybolt at 217/524-3868.

Douglas W. Clay, P.E.  
Manager Hazardous Waste Branch  
Permit Section, Bureau of Land

DWC:RGR

cc: Maywood  
USEPA

JKW  
ALD

B-113-m-1

MIKA, MEYERS, BECKETT & JONES

ATTORNEYS AT LAW

SUITE 700

200 OTTAWA AVENUE, N. W.  
GRAND RAPIDS, MICHIGAN 49503

ERNEST A. MIKA  
OF COUNSEL

J. WARREN EARDLEY  
(1923-1979)

TELEPHONE  
(616) 459-3200

FACSIMILE  
(616) 459-8065

January 12, 1993

RECEIVED

JAN 14 1993

IEPA-DLPC

Amy Dragovich  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62794-9276

In re: Detrex Corporation, Melrose Park Facility  
RCRA Part B Permit -- Permit No. 113  
IEPA No. 0311860003

Dear Ms. Dragovich:

On behalf of Detrex Corporation, I am writing this letter to formally request a modification of Detrex's RCRA Part B permit which was issued on September 30, 1992, and effective November 4, 1992. Specifically, Detrex requests that Section I(B)(4) be changed to read as follows:

4. Prior to the shipment of any drummed waste to Detrex from a new customer, a preliminary assessment of the waste shall be conducted at the generator's facility. This preliminary assessment shall include analysis of a waste sample for specific gravity, ignitability and a visual inspection of a full depth sample, using a coliwasa, to determine color and phases. This sampling shall be conducted by Detrex's personnel unless the generator has conducted this analysis within the last year, the drum sealed and all results recorded in Detrex's operating record. A representative sample, obtained by Detrex personnel, shall then be sent to the laboratory and analyzed for specific gravity, ignitability, organics and ~~TCLP~~ total metals unless the generator has conducted an analysis, which includes specific gravity, ignitability, organics and ~~TCLP~~ total metals of the waste stream within the ~~last-year~~ last 2 years. The results of all labora-

Amy Dragovich  
January 12, 1993  
Page 2

tory analyses shall be recorded in Detrex's operating record and must also indicate who obtained the sample, the date of the sampling, and the sampling procedures used.

Last month, you and I discussed this change and the basis for Detrex's request for the modification. I believe this change makes paragraph B(4) consistent with paragraph B(9) which provided for testing for total metals rather than TCLP metals. It also makes the two year period consistent with the two year period of time set forth in paragraph B(9)(a)(1).

I believe these changes are consistent with my discussion with you earlier, and provide more than adequate assurance that the materials received by Detrex at the Melrose Park Facility are properly characterized and handled in accordance with the requirements of RCRA.

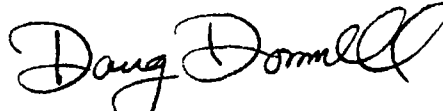
Additionally, I wish to confirm my discussion with you last month regarding the corrective action requirements in Section III of the permit. As you may recall, the individuals at Detrex who were working on this permit did not actually receive a copy of the permit until early November, 1992, notwithstanding the fact that the permit was apparently issued on September 30, 1992. In my earlier telephone conversation with you, you agreed to allow a 30 day extension of the time period set forth in Section III(B) for preparation of a RCRA Facility Investigation Phase I Workplan. Detrex is currently working on this, and should be able to meet the revised deadline.

Please contact me if you have any questions regarding the above. If you need anything further in writing regarding the request for modification of the permit, please let me know and I will be happy to assist in any way possible. Thank you for your

Amy Dragovich  
January 12, 1993  
Page 3

cooperation in this matter. I shall look forward to hearing from you in the near future.

Very truly yours,

A handwritten signature in cursive script, reading "Doug Donnell". The signature is written in black ink and is positioned above the printed name.

Douglas A. Donnell

DAD:jmn  
cc: Issa Shamiyeh  
Bill Moore



ILD 074 424938

DETREX CORPORATION

P.O. Box 5111, Southfield, MI 48086-5111

September 24, 1990

FAX: (313) 358-5803

Viva: Federal Express

TELEPHONE:

(313) 358-5800

Executive Director  
Region V Office  
U.S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, IL 60604

RE: Hazardous Waste Facility Permit 0980-44-OP  
Supplemental Permit No. 1984-875-SP  
Detrex Corporation  
2537 LeMoyne  
Melrose Park, IL 60160

Dear Sir,

Pursuant to 40 CFR 261 revision Thursday March 29, 1990 Federal Register regarding the Toxicity Characteristic Leaching Procedure (TCLP), we are here by making notification, as required by 40 CFR 270.42 Class 1 Modification, of the addition organic chemicals that effect our facility because of this rule.

EPA No.	Constitute	CAS Number
D004	Arsenic	7440-38-2
D005	Barium	7440-39-3
D018	Benzene	71-43-2
D006	Cadmium	7440-43-9
D019	Carbon Tetrachloride	56-23-5
D021	Chlorobenzene	108-90-7
D022	Chloroform	67-66-3
D007	Chromium	7440-47-3
D027	1,4-Dichlorobenzene	106-46-7
D028	1,2-Dichloroethane	107-06-2
D029	1,1-Dichloroethylene	75-35-4
D030	2,4-Dinitrotoluene	121-14-2
D034	Hexachloroethane	67-72-1
D008	Lead	7439-92-1
D009	Mercury	7439-97-6
D035	Methyl Ethyl Ketone	78-93-3
D036	Nitrobenzene	98-95-3
D038	Pyridine	110-86-1
D010	Selenium	7782-49-2
D011	Silver	7440-22-4

D039                   Tetrachloroethylene                   127-18-4  
D040                   Trichloroethylene                   79-01-6  
D043                   Vinyl Chloride                   75-01-4

These chemicals are being added since they are used as additives, cleaning agents, or are currently on our permit as other EPA listed waste; IE F-002 waste, which we are currently permitted for.

We are here by also notifying all persons or agencies as specified under 40 CFR 270.42 (a)(ii) of this modification.

If additional information is needed, or required please contact me at the above number and address.

Sincerely,

*William M. Moore, Jr.*

William M. Moore, Jr.  
Corporate Risk Management  
Environmental RCRA Compliance

cc: R. Jones  
I. Shamiyeh  
M. Tepatti  
D. Anderson  
Illinois EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

DATE: 10/2/90

Telephone Call

SUBJECT: Detrex (Gold Shield Solvents)

FROM: George Hamper

TO: William M. Moore, Jr.

I called to tell him that he should have submitted a revised Part A rather than a Class I permit modification request, because we have not made a final permit decision on Detrex's Part B application yet.

George  
Received this [ ]  
with notification  
for Michigan facilities  
No date rec'd stamp  
anywhere Rich

9/24/90 letter

Received from Rich on  
Tuesday 10/2/90

Received from Rich on  
Tuesday 10/2/90

Melrose PK. I L  
ILD 074 424 938